

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

XPO LOGISTICS FREIGHT, INC. - XCR

651 50TH AVENUE DRIVE SW
CEDAR RAPIDS, IA 52404
(734) 757-1657

EPA RCRA ID No. IAR000515635

ON

SEPTEMBER 19 – 20, 2017

BY

BOOZ ALLEN HAMILTON

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
ENVIRONMENTAL SCIENCES & TECHNOLOGY DIVISION

INTRODUCTION

At the request of the Environmental Sciences & Technology Division (ENST) and the Environmental Field Compliance Branch (EFCB) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) on September 19 – 20, 2017, at XPO Logistics Freight, Inc. – XCR (XPO) located in Cedar Rapids, Iowa. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Booz Allen gathered information and data necessary for EPA to determine compliance with applicable regulatory and statutory requirements. During the CEI, it was discovered that XPO currently generates greater than 100 kilograms (220 pounds) and less than 1,000 kilograms (2,200 pounds) of hazardous waste per calendar month. At these rates, XPO is currently operating as a small quantity generator (SQG) of hazardous waste. XPO is also a generator of used oil. The CEI was conducted as a Level B Multimedia Screening Inspection, and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.

XPO has never been inspected by the EPA.

PARTICIPANTS

The following persons participated in the CEI. A copy of the business card obtained from the facility representative during the CEI is included in Attachment 2.

Facility Representatives, XPO:

Name	Title	E-mail/fax	Phone
Dean Jackson	Service Center Manager	Dean.jackson@xpo.com fax (319) 363-3224	(319) 363-6513
Liz Frazier	OS&D Clerk	E-mail not obtained fax not obtained	Number not obtained

EPA Representative, Booz Allen:

Name	Title	E-mail/fax	Phone
William F. Starks	Environmental Specialist	starks_william@ne.bah.com fax (816) 448-3850	(816) 448-3250

INSPECTION PROCEDURE

I arrived at XPO at approximately 1130 hours to conduct the visual reconnaissance. The visual reconnaissance was conducted to identify and document potential areas of concern from the adjacent roadways. I identified no environmental issues or areas of concern during this preliminary examination.

At approximately 1145 hours, I entered the building, and signed the visitor's sign-in sheet. I then identified myself to four employees in the office area, and explained the purpose of the CEI. I asked to speak with someone who could provide assistance with the CEI. An employee pointed to the corner office and said that Mr. Jackson would help. I entered Mr. Jackson's office, and identified myself. After exchanging business cards, I proceeded to conduct an entry briefing with Mr. Jackson in his office.

During the entry briefing, I explained to Mr. Jackson the purpose and scope of the CEI. I also presented Mr. Jackson with a copy of RCRA §3007(a) (stipulating hazardous waste inspection authority) and a copy of 42 U.S.C. 1001/1002 (requiring the provision of truthful and accurate information and documentation). These documents were read by Mr. Jackson prior to continuing the CEI.

I presented Mr. Jackson with my EPA credential letter, and a letter and business card from the EPA Task Order Contracting Officer Representative (TOCOR), Mr. Ken Herstowski. I then explained the EPA policy regarding the collection of confidential business information (CBI) to Mr. Jackson. I also stated that, at the conclusion of the CEI, he would be presented with the EPA *Confidentiality Notice*. At that time, a CBI claim could or could not be made for any or all of the information collected during the CEI.

The CEI consisted of a discussion of facility operations, waste generation and waste management practices; a review of pertinent records; a visual inspection; and an exit briefing. Mr. Jackson acted as the official facility representative during the CEI and accompanied me during the visual inspection.

Ms. Frazier assisted during the CEI. At that time she joined, I provided Ms. Frazier a copy of 42 U.S.C. 1001/1002 which she read prior to continuing the CEI.

I completed a majority of the visual inspection and a portion of the records review on September 19, 2017. I returned to the facility on September 20, 2017 at 0800 hours to complete the CEI and summarized my findings and recommendations with Mr. Jackson during an exit briefing. Based upon the initial observations, **I issued a Notice of Preliminary Findings (NOPF) to XPO at the conclusion of the CEI.**

During the exit briefing, Mr. Jackson acknowledged receipt of the following by his signature: a Confidentiality Notice (Attachment 3), which he read and signed indicating no confidential business information had been provided during the CEI, a Receipt for Documents and Samples (Attachment 4), and the NOPF (Attachment 5). Twenty (20) photographs (photos) were taken during the CEI, of which, nineteen (19) are included in Attachment 6.

FINDINGS AND OBSERVATIONS

Facility Operations

XPO is a trucking company that performs no manufacturing. The facility is a transfer station that provides management over the flow of goods and materials between points of origin to end-use destination.

Service work (i.e. oil changes, tire rotation, brake work) on its truck fleet is performed off-site at an XPO facility in Des Moines, IA. Minor repairs needed are performed by Papas Trucks (Cedar Rapids, IA).

Service work of the facility's fork trucks is performed on-site by M&H Equipment (Decatur, IL). The service contractor removes all wastes (e.g. used oil, used oil filters, lead acid batteries) from service work and transports it back to its facility prior to shipment for recycling/reclamation. The facility has 18 fork trucks that generate approximately 36 gallons of used oil and 24 used oil filters annually.

The facility had a lighting project in 2015 that was performed by Facility Source Management. The service contractor transported all waste associated with the lighting project (e.g. waste lamps, fixtures) back to its facility prior to shipment for recycling. The facility has not generated any waste lamps since the lighting project.

The facility utilizes alkaline batteries for flashlights. The waste batteries are considered nonhazardous waste and disposed into the general trash.

Waste (hazardous and nonhazardous) is generated in one of three ways. It is received damaged, or it is damaged on site, or it is damaged during delivery. As such, the generation is episodic in

nature (i.e. not planned). When freight is received damaged or damaged on-site, the freight is delivered; provided it is safe to transport (i.e. no broken glass or chemical spills). If the delivered damaged freight is rejected and returned to the facility; it is placed in the Over, Short, and Damaged (OS&D) Area. If the freight is damaged after leaving the facility, rejected, and returned to the facility; it is placed in the OS&D Area.

Ms. Frazier described the OS&D Area process. When an item cannot be delivered, it is brought to the OS&D Area. Once in the area, it is written on the OS&D board to track its disposition. This is done by assigning a numbered color-coded cone which is placed atop the item. The color-coding system utilized is as follows:

- Red – All refused freight (damaged and non-damaged)
- Yellow – Overfreight (more shipped than ordered)
- Green – Ready for delivery
- Blue – Deliver on scheduled appointment
- Orange – Under investigation

Ms. Frazier explained that she investigates all items in the OS&D area and fills out an inspection report. She explained that she reassigns the cones dependent upon the investigation. Ms. Frazier stated that she then pulls the bill of lading to find out if the damaged item is considered a hazardous material (HAZMAT item). She explained that she also scans the PRO tracking number to pull up the invoice details. Ms. Frazier stated that she does this to confirm the HAZMAT status of the item.

If the item is a non-HAZMAT item, she calls the Shipper to find out their disposition on the item and the value of the item. Ms. Frazier explained that the Shipper may want the damaged item back; at which point they ship the item back to the Shipper at no charge. She added that if the Shipper does not want the item back, the facility holds the item and submits a Salvage Request to Corporate XPO.

If the Salvage Request is approved, the damaged item is transported to CMK Salvage (Independence, MO) as salvaged freight and resold. If the item does not have value (i.e. too damaged for resale or not of enough value to transport) it is disposed into the general trash. General trash is compacted into a six-cubic-yard container and transported by Waste Management to the Cedar Rapids Landfill for disposal.

For HAZMAT items, as defined in 49 CFR §171.8, the facility contacts their vendor for HAZMAT items, Emergency Response & Training Solutions (ERTS). HAZMAT items may or may not be a hazardous waste. ERTS uploads the details of the HAZMAT item [i.e. safety data sheets (SDSs), labels for shipping, manifests) into Titan Cloud Software (data management software program). ERTS also provides guidance to the facility on how to manage the HAZMAT item (i.e. types of containers, how to clean up spills). If the damaged HAZMAT item resulted in a spill too large for the facility to clean up, ERTS sends a crew to conduct the spill clean-up. All HAZMAT items are picked up by Stericycle (Kansas City, MO) and transported to Excel (Memphis, TN) or Petro Chem Processing (Detroit, MI).

The XPO facility consists of a single building with approximately 23,200 square feet under roof (office – 2,200 and dock – 21,000 square feet) owned by XPO. According to Mr. Jackson, XPO has been operating at its current location since April 25, 2006 and employs approximately 75

full-time personnel. The dock operates one shift (1200 to 2000 hours), and the drivers operate one shift (0900 to 1700 hours) on a Monday through Friday schedule. XPO's primary North American Industrial Classification System (NAICS) code is 484122 (General Freight Trucking, Long-Distance, Less Than Truckload).

Facility Status

The Hazardous Waste Site Info Verification Report for Inspector (Attachment 7) indicates that XPO is registered with EPA, under EPA ID IAR000515635, as a large quantity generator (LQG) of hazardous waste. Through a review of current operations, facility records, and interview with Mr. Jackson, I determined that XPO is operating as a SQG of hazardous waste.

On March 30, 2015, the facility sent the EPA a notification that it is a LQG of hazardous waste. This was due to a container being damaged and resulted in 350 gallons of hazardous waste (D002 characteristic) being generated. I estimated the weight of the 350 gallons to be approximately 2,625 pounds (350 gallons times 7.5 pounds per gallon). The facility has not generated over 2,200 pounds of hazardous waste in any month since March 2015. However, the facility has generated over 220 pounds (SQG threshold) four times since March 2015 (two months in 2016, and two months in 2017). The facility shipped 198 pounds of hazardous waste [very small quantity generator (VSQG) status] in July 2017 (generated in June 2017). The facility generated approximately 256 pounds of hazardous waste in July 2017 which has not been shipped. In the past three years (36 months), the facility operated as a LQG of hazardous waste one month, a SQG of hazardous waste four months, a VSQG of hazardous waste one month, and a non-generator of hazardous waste for 30 months. As such it appears that the facility operates as a SQG of hazardous waste two months per year. Currently the hazardous waste generated in July 2017 remains on-site. Therefore, I determined XPO is operating as a SQG of hazardous waste and inspected the facility as such.

XPO generates approximately 36 gallons of used oil and 24 used oil filters annually. Therefore, I also inspected XPO as a generator of used oil.

Following the CEI, I amended the Hazardous Waste Site Info Verification Report for Inspector to reflect XPO's current operations. Specifically, I changed the Types of Regulated Activity to SQG of hazardous waste, and added used oil generator. I also added D001 and D007 characteristic hazardous waste codes to the Hazardous Waste Handled section.

Facility Waste Streams

A Waste Stream and Waste Handling Table for XPO is presented below. The table describes the major waste streams generated on-site; waste management practices; and off-site treatment, storage, and disposal. A description of the major waste streams and management practices is also found in the *CEI Worksheets and Checklists* (Attachment 8).

**Waste Stream and Waste Handling Table
XPO – Cedar Rapids, IA**

Name of Waste Stream	Hazardous Determination	Generating Process	Estimated Generation Rate	On-Site Management	Off-Site Management
1) Damaged Freight (Hazardous)	Hazardous (D001, D002, D007) by product knowledge, safety data sheets (SDSs)	Freight moving by fork trucks and transportation damage	Episodic generation; between 198 and 2,625 pounds per episode; 5 episodes (shipments) since May 6, 2015	Transferred to OS&D area and containerized and/or packaged for shipment	Transported by Stericycle to Excel (Memphis, TN) or Petro Chem Processing (Detroit, MI) for fuel blending, neutralization, or transfer to another treatment, storage and disposal (TSD) facility
1) Damaged Freight (Nonhazardous)	Nonhazardous by product knowledge, SDSs	Freight moving by fork trucks and transportation damage	Episodic generation; between 10 and 8,925 pounds per episode; 8 episodes (shipments) since August 20, 2014	Transferred to OS&D area and containerized and/or packaged for shipment	Transported by Stericycle to TSD facility or disposed into general trash
3) Used Oil and Used Oil Filters	Managed as used oil, per 40 CFR §279	Facility fork truck maintenance	Estimated 36 gallons of used oil and 24 used oil filters per year (based on facility representative estimate)	Removed by service contractor (NMC) upon generation, no accumulation on-site	Transported by NMC (Mason City, IA) to its facility for recycling
4) Spent Lead-Acid Batteries	Hazardous (D008) by product knowledge; managed as lead-acid batteries per 40 CFR 266	Facility fork truck maintenance	Unknown, not tracked	Removed by service contractor (NMC) upon generation, no accumulation on-site	Transported by NMC (Mason City, IA) to its facility for reclamation
5) Used Alkaline Batteries	Nonhazardous by product knowledge	Facility equipment maintenance	Unknown, not tracked	Disposed into general trash	Transported by Waste Management to the Cedar Rapids Landfill for disposal.

**Waste Stream and Waste Handling Table
XPO – Cedar Rapids, IA**

Name of Waste Stream	Hazardous Determination	Generating Process	Estimated Generation Rate	On-Site Management	Off-Site Management
6) General Trash	Nonhazardous, by product/process knowledge	All other solid wastes (office/packaging wastes, etc.) not recyclable	Two, six-cubic-yard containers per week	Accumulated in various containers and transferred to six-cubic-yard compactor	Transported by Waste Management to the Cedar Rapids Landfill for disposal.

Visual Inspection

The transporting and handling process and facility maintenance activities generate the solid and hazardous wastes listed in the Waste Stream and Waste Handling Table above. During the CEI, the generation, accumulation, and storage areas associated with these wastes were visually inspected. Each of the general areas described below are identified on the facility map obtained during the CEI (Attachment 9).

Photographs taken during the visual inspection are referenced and described in the discussions below. Additionally, I obtained a Google Maps satellite photograph of the facility and included as Attachment 10.

OS&D Area

Mr. Jackson and I went to the OS&D Area. In the area I observed the OS&D board (Attachment 6, Photo 1). I also observed visual aids posted describing the color-coding system (Attachment 6, Photos 2 and 3).

I observed the items in the OS&D Area (Attachment 6, Photos 4 through 6). The table below is an inventory of the items in the OS&D Area.

Cone	Number	Container Type	Item
Yellow 32	1	Pallet	Tyson Chicken
Yellow 94	1	Pallet	Baby Jogger Liquid Holster
Red 2	6	Boxes	Choice Organic Tea
Yellow 27	4	Boxes	Kashi Go Lean Crunch
Red 1	1	25-pound bag	Table salt
Red 5	2	Boxes	Kashi Heart to Heart Cereal
Yellow 90	2	Boxes	Choice Organic Tea
Yellow 86	1	Box	Kashi Berry Fruitful Biscuits
Red 49	1	Box	Kashi Cinnamon Harvest Biscuits
Yellow 23	3	Boxes	2 Filter Restriction Gages; 1 unknown
Orange 11	1	Pallet	Green Farm Equipment
Red 22	1	Pallet	Two Transformers
Green 87	1	Box	John Deere Parts
Red 6	7	Boxes	Jelly Preserves
Orange 3	1	Pallet	Metal Parts
Yellow 49	1	Pallet	Smuckers Jelly
Red 50	1	Box	Chain
Orange 17	1	Pallet	Gas Fired Heater
Red 20	1	Pallet	CO2 Pure Coconut Water
Red 9	1	Pallet	Metal Cabinets
Red 16	4	Boxes	Plastic Pellets
Red 19	2	Rolls	Carpet
Red 14	1	Pallet	Assorted Shampoos
Red 18	1	1/2-gallon Bucket	Bio-hazardous Waste
Red 8	1	Pallet	Roof-Tek Poly-Sil 2200 White

I observed a ½ gallon container of bio-hazardous waste in the OS&D Area with an accumulation start date of August 14, 2014 (Attachment 6, Photo 7). I asked Mr. Jackson how the bio-hazardous waste was generated. Mr. Jackson stated that one of the dock workers sustained a minor injury, and the waste was generated during his on-site treatment. I noted an accumulation start date of August 14, 2014 on the label. Mr. Jackson stated that the year is a typo and the injury occurred on August 14, 2017.

I observed a pallet holding five, full five-gallon containers of Roof-Tek Poly-Sil 2200 Series White (Roof-Tek Poly) in the OS&D Area (Attachment 6, Photos 8 and 9). I noted the PRO Number is 522379712. I also noted that four of the containers appear to be in good condition with no apparent leaks, but one of the containers is stained on the top and side of the container (Attachment 6, Photo 10). However, there is no liquid waste on the top or side of the container. I noted no labeling (hazardous or nonhazardous) and asked Ms. Frazier if the containers are a waste. Ms. Frazier stated that they are a waste. I asked Ms. Frazier if I could get a copy of the SDS for the Roof-Tek Poly. Ms. Frazier supplied a copy of the SDS (Attachment 11).

Upon review of the SDS, I noted a flashpoint of greater than 108 degrees Fahrenheit (°F). I also noted in Section 12 – Disposal Considerations, it states that the product has been tested and found to have a flashpoint below 140°F; and if discarded in liquid form, the product may be treated as a hazardous waste based on the characteristic of ignitability (D001). As the Roof-Tek Poly is a waste, it appears that the waste Roof-Tek Poly is a hazardous waste. The five, five-gallon hazardous waste accumulation containers are not labeled with the words “hazardous waste,” not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date (Attachment 6, Photos 11 through 15).

NOPF No. 1 - Failure to label a hazardous waste accumulation container with the words “hazardous waste” [40 CFR §262.16(b)(6)(i)(A)].

NOPF No. 2 - Failure to label a hazardous waste accumulation container with an indication of the nature of the waste [40 CFR §262.16(b)(6)(i)(B)].

NOPF No. 3 - Failure to label a hazardous waste accumulation container with an accumulation start date [40 CFR §262.16(b)(6)(i)(C)].

I explained these preliminary findings to Mr. Jackson and Ms. Frazier during the CEI. I asked Ms. Frazier how long the containers have been in the OS&D Area. Ms. Frazier stated that the containers have been in the OS&D Area since July 7, 2017 (74 days in accumulation).

Ms. Frazier stated that originally, there were 10, five-gallon containers; the five containers of Roof-Tek Poly, and five, five-gallon containers of another Roof-Tek product. She added that when contacted, Roof-Tek did not want the product returned due to quality concerns. Ms. Frazier stated she pulled up the bill of lading and it noted that the damaged items are not considered HAZMAT items. She explained that she also scanned the PRO tracking number to pull up the invoice details, which showed that the damaged items are not HAZMAT items. However, when she contacted ERTS with the product names, ERTS stated that the five containers of Roof-Tek Poly were a HAZMAT item, and the other five containers of Roof-Tek product were nonhazardous. Ms. Frazier stated that she went to the Titan Cloud Software web site to print the labels and shipping documents for the ten containers (five nonhazardous waste

labels, and five hazardous waste labels). She explained that she placed the labels on the containers and contacted Stericycle for shipment. Ms. Frazier supplied a copy of the hazardous waste label (stating that it was deemed a waste on July 6, 2017) she placed on the five containers of Roof-Tek Poly (Attachment 12).

Ms. Frazier stated that Stericycle arrived at the facility on August 31, 2017 for the shipment. She explained that the Stericycle driver looked at the shipping documents and stated that the five containers labeled as hazardous waste (Roof-Tek Poly) are not hazardous waste and he would not take them.

Ms. Frazier stated that the Stericycle driver broke apart the sheeting tying the ten containers together, removed the hazardous waste labels from the five containers of Roof-Tek Poly, and stated he would only take the five containers labeled as nonhazardous waste. Ms. Frazier stated that she asked the driver if she relabeled the containers as nonhazardous waste if he would take them with the other nonhazardous waste containers. Ms. Frazier stated the driver refused to take the five containers of Roof-Tek Poly. She added that she contacted XPO corporate and advised of what the driver stated and that the five containers of Roof-Tek Poly did not ship. Ms. Frazier supplied a copy of the printout from the Titan Cloud Software website showing the active containers (on-site) which shows the status of the Roof-Tek Poly (Attachment 13). I noted that for PRO Number 522379712 has "Pending Analysis" listed as the Status.

Prior to the conclusion of the CEI, I returned to the OS&D Area and observed that facility personnel labeled the five containers of Roof-Tek Poly with the words "hazardous waste," an accumulation start date of July 7, 2017, and an indication of the nature of the waste (Attachment 6, Photos 16 and 17).

In the OS&D Area, I observed six salvage drums to be utilized for emergency response (Attachment 6, Photo 18). I also observed other items (e.g. sorbents, brooms, dust pans, rags, and fire extinguishers) for emergency response in the area, but did not photograph them. I asked Mr. Jackson if the facility has information posted by a telephone for emergency response. Mr. Jackson and I went to the office area where I observed the emergency coordinator's name (Mr. Jackson) and telephone number, the fire department telephone number, and a facility map that showed the location of fire extinguishers and spill control equipment (Attachment 6, Photo 19). Mr. Jackson supplied a copy of the emergency response telephone numbers posted by the telephone (Attachment 14). I did not request a copy of the map showing the location of fire extinguishers and spill control equipment.

Records

On September 19 – 20, 2017, I reviewed the following facility records:

- Facility Maps (Attachment 9)
- SDS for Roof-Tek Poly-Sil 2200 White (Attachment 11)
- Hazardous waste label used for Roof-Tek Poly-Sil 2200 White (Attachment 12)
- Titan Cloud Software Container Detail Report for active containers (Attachment 13)
- Emergency Response information posted by a telephone (Attachment 14)
- Hazardous waste manifests and land disposal restriction (LDR) notification forms from May 6, 2015 to present (copies of six hazardous waste manifests generated from May 6, 2015 to present are included in Attachment 15)

- Hazardous waste manifest 016314721JJJ, dated April 25, 2017, and supporting documentation (Attachment 16)
- Titan Cloud Software Container Detail Report for completed shipments (Attachment 17)

XPO has generated six hazardous waste manifests (five with hazardous waste, and one with nonhazardous waste) since May 6, 2015 (Attachment 15). I noted no RCRA concerns with the hazardous waste manifests.

I noted each of the manifests is packaged with supporting documentation [e.g. Incident Report, Shipping Order, Salvage Request, two manifests (Generator Initial Copy and Designated Facility to Generator), Certificate of Recycling/Disposal, and LDR Notification form]. Ms. Frazier supplied a copy of the supporting documentation for manifest 016314721JJJ, a shipment on April 25, 2017 (Attachment 16).

Ms. Frazier also supplied a copy of a Titan Cloud Software Container Detail report that shows the completed shipments (Attachment 17). I noted the report shows the date an item is deemed to be a waste and the scheduled pick-up date. I also noted that some of the items do not have a scheduled pick-up date. Ms. Frazier stated that she is unsure why the dates do not show up, as all of the items have shipped.

At the conclusion of the CEI, I conducted an exit briefing with Mr. Jackson. I discussed the preliminary findings noted during the visual inspection and the regulations pertaining to each situation. In addition, I provided the following materials to Mr. Jackson:

- Copy of RCRA §3007(a)
- Copy of 42 U.S.C. 1001/1002
- EPA Information Sheet: *Commercial Motor Vehicle Transportation System Security & Safety-CMV Transportation Security Planning*
- EPA Homeland Security Bulletin: *US EPA Region 7, December 2001, Security Awareness for Agricultural/Industrial Facilities, Pipelines, Transporters, Utilities, Warehouses of Chemicals*
- EPA *Managing your Hazardous Waste, a Guide for Small Business*
- EPA Supplemental Information for Small Businesses Subject to a U.S. EPA Enforcement Action
- EPA Environmental Compliance Assistance Centers: Sector Specific Centers pamphlet
- EPA Office of Enforcement and Compliance Assurance Information Sheet: US EPA Small Business Resources handout
- EPA RCRA Online Reference Guide
- EPA Compliance Assistance Centers handout
- Iowa Department of Natural Resources Iowa Waste Exchange handout and pamphlet
- Iowa Department of Natural Resources Pollution Prevention Services pamphlet
- Iowa Department of Natural Resources Pollution Prevention Services folder
- Iowa Department of Economic Development *Iowa Environmental Guide for Business*
- Iowa Waste Reduction Center On-Site Review Program pamphlet
- Pollution Engineering article *10 Common Questions for Waste Generators*
- Instructions for Responding to an NOPF
- Fact Sheet About the Hazardous Waste Generator Improvements Final Rule

- Blank copy of CEI Worksheets and Checklists for (Revised Checklist, r.01) (electronically)
- FINAL Iowa HWGI Rule Presentation 07Mar17 (electronically)
- HWGI Rule Crosswalk to Old Citations (electronically)

SUMMARY

During the XPO CEI, I discovered through interviews with facility personnel, records review, and visual inspection that XPO generates between 220 and 2,200 pounds of D001, D002, D007 characteristic hazardous waste two months per year. As such, XPO is currently operating as a SQG of hazardous waste. XPO is also operating as a generator of used oil.

I issued an NOPF to XPO at the conclusion of the CEI. This notice includes the following preliminary findings:

NOPF No. 1 - Failure to label a hazardous waste accumulation container with the words “hazardous waste” [40 CFR §262.16(b)(6)(i)(A)].

NOPF No. 2 - Failure to label a hazardous waste accumulation container with an indication of the nature of the waste [40 CFR §262.16(b)(6)(i)(B)].

NOPF No. 3 - Failure to label a hazardous waste accumulation container with an accumulation start date [40 CFR §262.16(b)(6)(i)(C)].

Before exiting the facility, I referred to the EPA TOCOR’s contact information letter, which was presented to Mr. Jackson during the entry briefing. I encouraged the facility representative to provide EPA with written planned and/or completed actions as corrective measures to the NOPF.

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.



William F. Starks

Date: 10/24/2017

ATTACHMENTS

- 1: Region 7 Multimedia Screening Checklist (2 pages)
- 2: Copy of Facility Representative Business Card (1 page)
- 3: Copy of the EPA Confidentiality Notice (1 page)
- 4: Copy of the EPA Receipt for Documents and Samples (1 page)
- 5: Notice of Preliminary Findings (NOPF) (1 page)
- 6: Photographic Documentation (13 pages)
- 7: Copy of Hazardous Waste Site Info Verification Report for Inspector (2 pages)
- 8: CEI Worksheets and Checklists (18 pages)
- 9: Copy of Facility Maps (2 pages)
- 10: Copy of Google Maps Image of XPO (1 page)
- 11: Copy of SDS for Roof-Tek Poly-Sil 2200 Series (4 pages)
- 12: Copy of Hazardous Waste Label for Roof-Tek Poly-Sil 2200 Series (1 page)
- 13: Copy of Titan Cloud Software Container Detail Report for Active Containers (1 page)
- 14: Copy of Emergency Response Telephone Numbers Posted by the Telephone (4 pages)
- 15: Copy of Hazardous Waste Manifests, Dated May 6, 2015; February 1, 2016; May 20, 2016; April 25, 2017; July 19, 2017; and August 31, 2017 (7 pages)
- 16: Copy of Supporting Documentation for Manifest 016314721JJK, Dated April 25, 2017 (9 pages)
- 17: Copy of Titan Cloud Software Container Detail Report for Completed Containers (2 pages)

Forward To:

EPCRA / RMP / TSCA ☒

CWA ☐

Wetlands ☐

UIC ☐

PWS ☐

CAA ☐ RCRA ☐

UST ☒

SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: XPO Logistics Freight Inc - XCR
Facility Ownership: Same
Street: 651 50th Ave. Dr. SW
City: Cedar Rapids State: IA Zip: 52404
Phone: 734-757-1657 Facility Contact: Jeff Sexton
Number of Employees: 75 Work Hours/Shifts: 0800-1700; 1200-2000
M-F Facility Subject to OSHA regulations Yes ☒ No ☐

Inspector: William F. Starks
Primary Media: RCRA
Inspector Phone Ext.: 816-448-3250
Date: 09/19-20/2017
SIC/NAICS Code: 484122

Main facility activity, major process chemical(s) & description: Freight transfer station

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐) , printing ☐ , reacting ☐ , formulating ☐ , distilling ☐ ,
water treatment ☐ , refrigeration ☐ , manufacturing ☐ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ ,
non-halogenated-based ☐) , combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other _____).

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☐ No ☒ **Forward to EPCRA**
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ **Forward to EPCRA**
3. Has the facility: **If any box in question 3 is marked - Forward to EPCRA**
 - a. Stored ≥500 lbs of ammonia ☐ , ≥100 lbs of chlorine ☐ , or ≥10,000 lbs of an industrial chemical ☐ , at any time over the last 2 years? ☐
 - b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
 - c. Used ≥10,000 lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐
 - d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ **Forward to PCB and ask** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - **Get Photo**

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any water/wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
If yes, are all water/wastewater discharges permitted? Yes ☐ No ☐ **Forward to CWA**
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐
If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☐ **Forward to CWA**
If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ **Forward to CWA**
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ **Forward to CWA**
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____
(Get Photo) **Forward to CWA**
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?
No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (Get Photo) **FWD to Wetlands**

Attachment 1 Page 1 of 2

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ *Forward to UIC*
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ *Forward to PWS*
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA)

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ *Forward to CAA*
Source _____ (Get Photo)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
If yes, is equipment permitted? Yes ☐ No ☐ *Forward to CAA Describe:* _____
3. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ *Forward to EPCRA/RMP*

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☒
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☒ (stop) No ☐ *Forward to RCRA*
2. Is hazardous waste treated ☐ , stored >90-days ☐ , burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ *Forward to RCRA*
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☐

Material Claimed To Be Non-Hazardous

How does the facility know these wastes are non-hazardous?

_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ *Forward to RCRA*
Describe: _____ (Get Photo)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ *Forward to RCRA*
Describe: _____ (Get Photo)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ *Forward to RCRA & EPCRA Describe:* _____ (Get Photo)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☐ Yes ☒ *Forward to UST*
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ *Forward to UST*

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☒ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ *Forward to SPCC*
If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ *Forward to SPCC*
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (Get Photo) *Forward to SPCC*

*PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS

Attachment 1 Page 2 of 2

XPOLogistics

Dean Jackson, XCR

Less-Than-Truckload | Service Center Manager

651 50th Ave Dr SW

Cedar Rapids, IA

O: 319-363-6513

C: 319-310-2150 | F: 319-363-3224

dean.jackson@xpo.com | xpo.com

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>XPO Logistics Freight Inc - XCR</i>	
Facility Address <i>651 50th Avenue Drive SW, Cedar Rapids, IA 52404</i>	
Inspector (print) <i>William F. Starks</i>	
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219 <i>Booz Allen Hamilton</i>	Date <i>09/20/2017</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Devin L. Jackson</i>	Signature/Date <i>[Signature] 9/20/17</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name

XPO Logistics Freight Inc - XCR

Facility Address

651 50th Avenue Drive SW, Cedar Rapids, IA 52404

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐

Documents/ Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ ☒ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

Hazardous Waste Manifests (7 pages)

Hazardous Waste Manifest Package (9 pages)

SDS Poly-Sil 2200 Series (4 pages)

Titan Cloud Summary Reports (3 pages)

Hazardous Waste Label (1 page)

Emergency Action Plan (3 pages)

Workplace Injuries Hotline (1 page)

Facility Map (2 pages)

Facility Representative (print)

Dean C. Jackson

Signature/Date

Dean C. Jackson 9/20/17

Inspector (print)

William F. Starks

Signature/Date

William F. Starks 09/20/2017

U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219

Booz Allen Hamilton

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: XPO Logistics Freight Inc - XCR
ADDRESS: 651 50th Avenue Drive SW
Cedar Rapids, IA 52404
EPA ID NUMBER: IAR000515635 DATE: 09/20/2017

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to label hazardous waste accumulation container with the words "hazardous waste" 40 CFR 262.16(b)(6)(i)(A).
2. Failure to label hazardous waste accumulation container with an indication of the nature of the waste, 40 CFR 262.16(b)(6)(i)(B).
3. Failure to label hazardous waste accumulation container with an accumulation start date, 40 CFR 262.16(b)(6)(i)(C).
4. _____
5. _____
6. _____
7. _____

If you have any questions regarding these findings please contact Ken Herstowski, US EPA

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Dean Jackson TITLE: Manager

SIGNATURE: [Signature]

This document was prepared by William F. Sterks

PHOTO LOG

Facility Name / City: XPO Logistics Freight, Inc. – XCR
651 50th Avenue Drive SW
Cedar Rapids, IA 52404

Facility ID #: IAR000515635

Date: September 19 – 20, 2017

Photographer: William F. Starks

Type of Camera: Sony Digital Still Camera, DCS – W830, Serial #1310546

Digital Recording Media: Memory Stick

All digital photos were copied by: William Starks on 10/04/2017

All digital photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital photos were downloaded to CD-R by William Starks on 10/04/2017. No changes were made in the original image files prior to print and storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	William Starks	09/19/2017	1218	003	The Over, Short, and Damaged (OS&D) board located next to the OD&D area. The board is utilized to track the disposition of OS&D items.
2	William Starks	09/19/2017	1219	004	A visual aid describing the OS&D Freight Flag/Cone System located in the OS&D area.
3	William Starks	09/19/2017	1219	005	Another visual aid describing the OS&D Freight Flag/Cone System located in the OS&D area.
4	William Starks	09/19/2017	1217	001	The OS&D area located at the north end of the Dock area. An inventory of the area is included in the report.
5	William Starks	09/19/2017	1217	002	Another view of the OS&D area located at the north end of the Dock area. An inventory of the area is included in the report.
6	William Starks	09/19/2017	1223	010	A pallet of Tyson chicken located in the OS&D area.
7	William Starks	09/19/2017	1220	006	A one-gallon container of bio-hazardous waste located in the OS&D area. The bio-hazardous waste was generated when a dock worker suffered a minor injury on the dock.
8	William Starks	09/19/2017	1221	008	5, 5-gallon hazardous waste accumulation containers located in the OS&D area. The hazardous waste accumulation containers are closed. One of the containers is stained on the top and side of the container, but no liquid waste is on the top or side of the container. The hazardous waste accumulation containers are not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
9	William Starks	09/19/2017	1220	007	A view of the label on 1 of the 5 hazardous waste accumulation containers in Photo 8 showing the contents identified as Roof-Tek Poly-Sil 2200 White; and not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.
10	William Starks	09/19/2017	1534	018	Another view of the stained hazardous waste accumulation containers in Photo 8 showing the staining on the container. There is no liquid waste on the top or side of the container. It also shows that the container is not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.
11	William Starks	09/19/2017	1533	013	Another view of 2 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.
12	William Starks	09/19/2017	1534	014	Another view of 1 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date. The container is stained on the side of the container, but no liquid waste is on the side of the container.
13	William Starks	09/19/2017	1534	015	Another view of 2 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.
14	William Starks	09/19/2017	1534	016	Another view of 2 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.
15	William Starks	09/19/2017	1534	017	Another view of 1 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
16	William Starks	09/20/2017	0923	019	The 5, 5-gallon hazardous waste accumulation containers in Photo 8 after facility personnel labeled the containers with the words "hazardous waste," labeled with an indication of the nature of the waste, and labeled with an accumulation start date of 07/06/2017.
17	William Starks	09/20/2017	0923	020	A view of one of the hazardous waste labels on I of the 5 hazardous waste accumulation containers in Photo 16 showing the container labeled with the words "hazardous waste," and a 07/06/2017 accumulation start date.
18	William Starks	09/19/2017	1221	009	6 salvage drums to be utilized for emergency response located in the OS&D area.
19	William Starks	09/19/2017	1447	012	Information posted by a telephone. The information includes the fire department telephone number, the name of the emergency coordinator and telephone number, and the location of fire extinguishers and spill control equipment.

XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 1
Photographer: William F. Starks
Date: 09/19/2017
Time: 1218
Description: The Over, Short, and Damaged (OS&D) board located next to the OD&D area. The board is utilized to track the disposition of OS&D items.

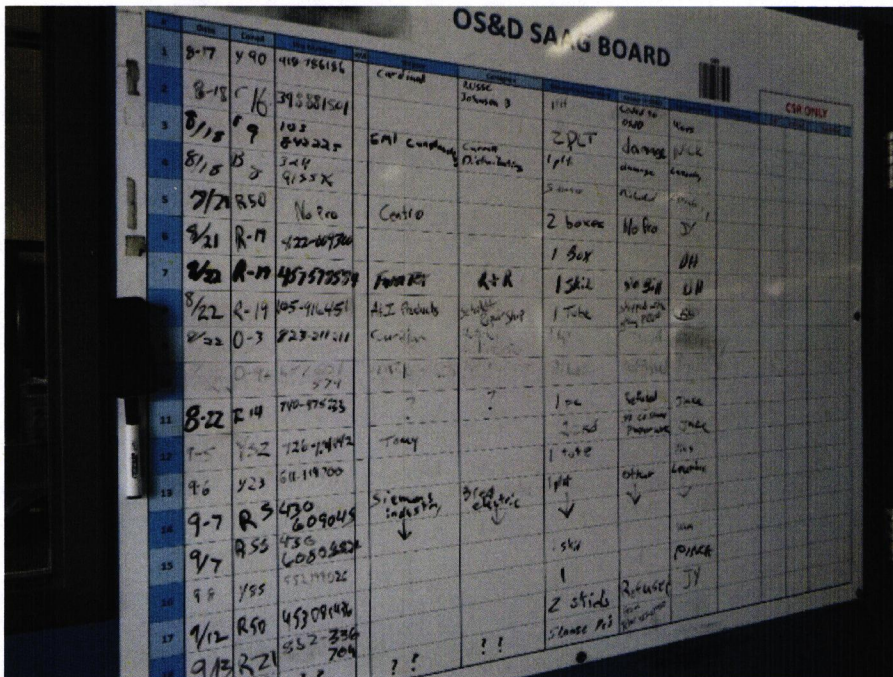


Photo Number: 2
Photographer: William F. Starks
Date: 09/19/2017
Time: 1219
Description: A visual aid
describing the OS&D Freight
Flag/Cone System located in the
OS&D area.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 3
Photographer: William F. Starks
Date: 09/19/2017
Time: 1219
Description: Another visual aid describing the OS&D Freight Flag/Cone System located in the OS&D area.

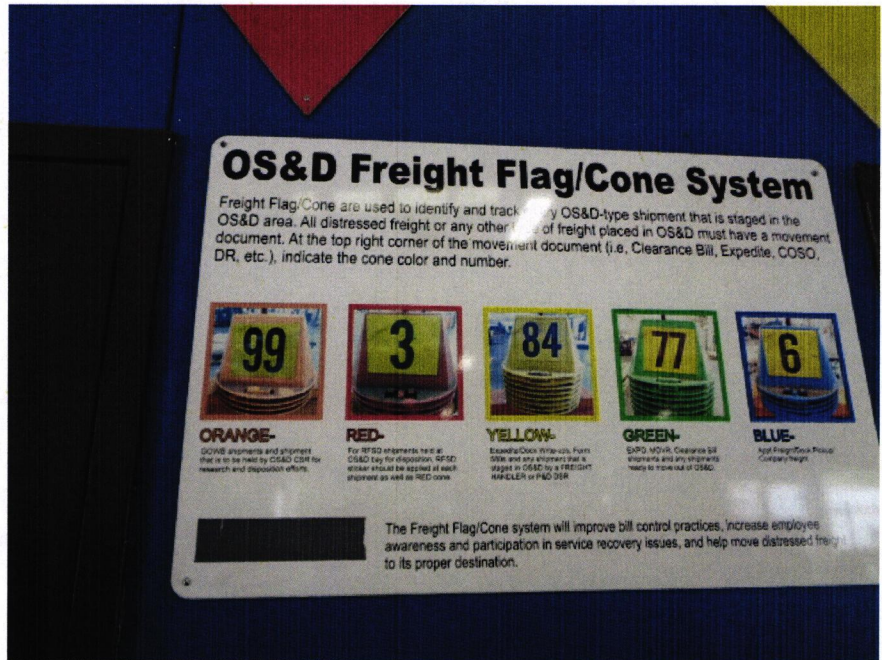


Photo Number: 4
Photographer: William F. Starks
Date: 09/19/2017
Time: 1217
Description: The OS&D area located at the north end of the Dock area. An inventory of the area is included in the report.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 5
Photographer: William F. Starks
Date: 09/19/2017
Time: 1217
Description: Another view of the OS&D area located at the north end of the Dock area. An inventory of the area is included in the report.



Photo Number: 6
Photographer: William F. Starks
Date: 09/19/2017
Time: 1223
Description: A pallet of Tyson chicken located in the OS&D area.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 7
Photographer: William F. Starks
Date: 09/19/2017
Time: 1220
Description: A one-gallon container of bio-hazardous waste located in the OS&D area. The bio-hazardous waste was generated when a dock worker suffered a minor injury on the dock.



Photo Number: 8
Photographer: William F. Starks
Date: 09/19/2017
Time: 1221
Description: 5, 5-gallon hazardous waste accumulation containers located in the OS&D area. The hazardous waste accumulation containers are closed. One of the containers is stained on the top and side of the container, but no liquid waste is on the top or side of the container. The hazardous waste accumulation containers are not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 9
Photographer: William F. Starks
Date: 09/19/2017
Time: 1220
Description: A view of the label on 1 of the 5 hazardous waste accumulation containers in Photo 8 showing the contents identified as Roof-Tek Poly-Sil 2200 White; and not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.



Photo Number: 10
Photographer: William F. Starks
Date: 09/19/2017
Time: 1534
Description: Another view of the stained hazardous waste accumulation containers in Photo 8 showing the staining on the container. There is no liquid waste on the top or side of the container. It also shows that the container is not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 11
Photographer: William F. Starks
Date: 09/19/2017
Time: 1533
Description: Another view of 2 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.



Photo Number: 12
Photographer: William F. Starks
Date: 09/19/2017
Time: 1534
Description: Another view of 1 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date. The container is stained on the side of the container, but no liquid waste is on the side of the container.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 13
Photographer: William F. Starks
Date: 09/19/2017
Time: 1534
Description: Another view of 2 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.



Photo Number: 14
Photographer: William F. Starks
Date: 09/19/2017
Time: 1534
Description: Another view of 2 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 15
Photographer: William F. Starks
Date: 09/19/2017
Time: 1534
Description: Another view of 1 of the 5 hazardous waste accumulation containers in Photo 8 showing the containers not labeled with the words "hazardous waste," not labeled with an indication of the nature of the waste, and not labeled with an accumulation start date.



Photo Number: 16
Photographer: William F. Starks
Date: 09/20/2017
Time: 0923
Description: The 5, 5-gallon hazardous waste accumulation containers in Photo 8 after facility personnel labeled the containers with the words "hazardous waste," labeled with an indication of the nature of the waste, and labeled with an accumulation start date of 07/06/2017.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 17
Photographer: William F. Starks
Date: 09/20/2017
Time: 0923
Description: A view of one of the hazardous waste labels on I of the 5 hazardous waste accumulation containers in Photo 16 showing the container labeled with the words "hazardous waste," and a 07/06/2017 accumulation start date.

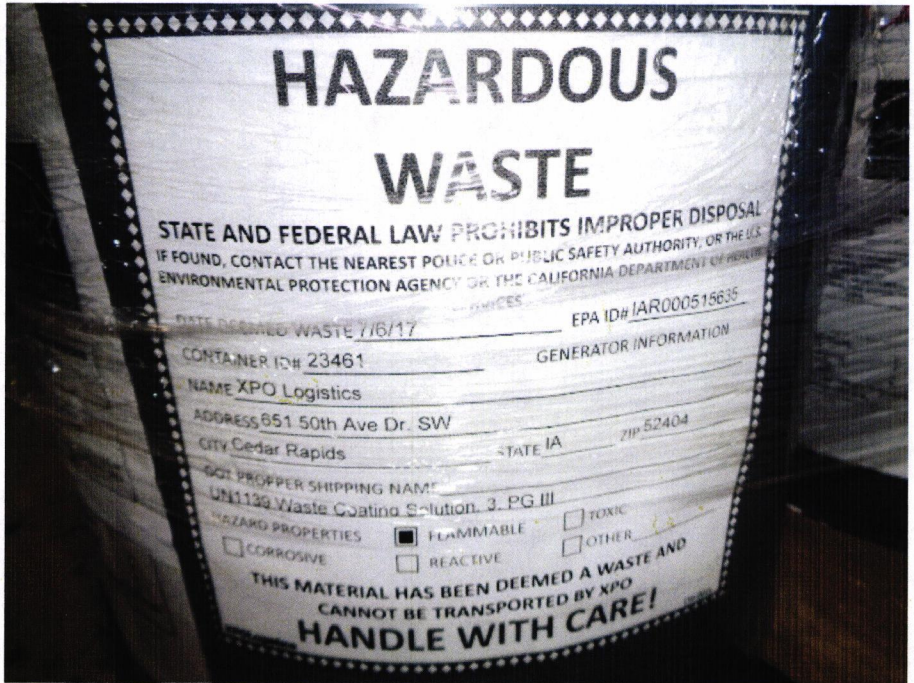


Photo Number: 18
Photographer: William F. Starks
Date: 09/19/2017
Time: 1221
Description: 6 salvage drums to be utilized for emergency response located in the OS&D area.



XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 19
Photographer: William F. Starks
Date: 09/19/2017
Time: 1447
Description: Information posted
by a telephone. The information
includes the fire department telephone
number, the name of the emergency
coordinator and telephone number, and
the location of fire extinguishers and
spill control equipment.



Hazardous Waste Site Info Verification Report for Inspector

January 27, 2017

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:

Present the Facility representative with a copy of their Site Info Verification Report (Iowa facilities only).

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to Elizabeth Koesterer, AWMD/WEMM.

Our instructions to them are printed on their Site Info Verification Report, and should be self explanatory. If the Iowa facility wants to revise their Site Info Verification Report, they can do so and mail it back to EPA R7, or have the inspector deliver it.

If a Kansas, Missouri or Nebraska facility wants to change their information, they must fill out a RCRA Subtitle C Site Identification Form (or equivalent State form) and mail it to the appropriate State.

EPA RCRA ID Number:

IAR000515635

Name of Company/Site:

XPO LOGISTICS FREIGHT INC -- XCR

Location of Site:

651 50TH AVE DR SW
CEDAR RAPIDS, IA 52404
LINN County

Land Type:

Private

NAICS:

484122 - GENERAL FREIGHT TRUCKING, LONG-DISTANCE, LESS THAN

Mailing Address:

2211 OLD EARHART RD STE 100
ANN ARBOR, MI 48105

Site Contact:

JEFF SEXTEN

Job Title:

MANAGER OF ENVIRONMENTAL COMPLIANCE

Address:

2211 OLD ERHART RD STE 100
ANN ARBOR, MI 48105

Email:

JEFF.SEXTEN@EMAIL.XPO.COM

Phone Number:

734-757-1657

Current Owner of Site:

XPO LOGISTICS FREIGHT INC

Phone Number:

734-757-1657

Owner Type:

Private

Current Operator of Site:

XPO LOGISTICS FREIGHT INC

Operator Type:

Private

TYPE(S) OF REGULATED ACTIVITY: Federal ^{Small} ~~Large~~ Quantity Generator

used oil generator

Date of Site Visit: 09/19-20/2017

Name of Inspector (Please print): William B. Steaks

(Check one): [] EPA R7 ENST [x] EPA R7 Contractor [] NOWCC/SEE Investigator

Signature of Inspector/Investigator: William B. Steaks

Attachment 7 Page 1 of 2

Hazardous Waste Site Info Verification Report for Inspector *January 27, 2017*

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:
Present the Facility representative with a copy of their Site Info Verification Report (Iowa facilities only).

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to Elizabeth Koesterer, AWMD/WEMM.

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If a Kansas, Missouri or Nebraska facility wants to change their information, they must fill out a RCRA Subtitle C Site Identification Form (or equivalent State form) and mail it to the appropriate State.

Hazardous Wastes Handled: D002 *0001 0007*

1st N 04/04/11 N 04/03/15 1

Certified by Notification on 05/16/16 by
JEFF SEXTON 03/23/16
MANAGER OF ENVIRONMENTAL COMPLIANCE

Date of Site Visit: *09/19-20/2017*
Name of Inspector (Please print): *William F. Starks*
(Check one): ☐ EPA R7 ENST ☒ EPA R7 Contractor ☐ NOWCC/SEE Investigator
Signature of Inspector/Investigator: *William F. Starks*

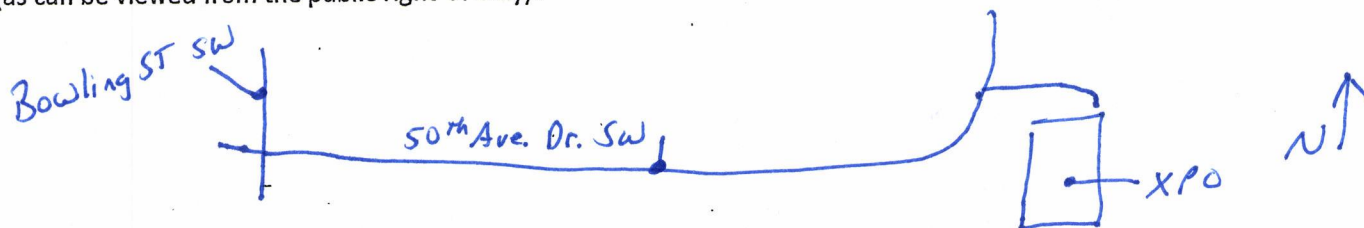
APPENDIX 1-1.

DRIVE-BY

Facility: XPO Logistics Freight IDC Date: 04/19-20/2017 Arrival time: 1145 hours

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

2. Determine the direction "North" with respect to the facility, and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☒ No

- | | | | |
|---|---|---|--|
| <input type="checkbox"/> Containers | <input type="checkbox"/> Tanks | <input type="checkbox"/> Processing Equipment | <input type="checkbox"/> Loading Areas |
| <input type="checkbox"/> Unloading Areas | <input type="checkbox"/> Security Devices | <input type="checkbox"/> Open Drums | <input type="checkbox"/> Stressed Vegetation |
| <input type="checkbox"/> Unusual Staining | <input type="checkbox"/> Unusual Odors | <input type="checkbox"/> Obvious Discharges | <input type="checkbox"/> Improper Disposal |
| <input type="checkbox"/> Safety Concerns | <input type="checkbox"/> Other Concerns | | |

APPENDIX 1-2.

SITE ENTRY AND INBRIEFING

1. ☒ Used main entrance ☒ Entered during normal operating hours ☒ No excessive delays (>15 min)

2. Facility Representative(s):

Name	Title	Years in position
Dean Jackson	Service Center Manager	~8 years
Liz Frazier	OS+D Clerk	~8 years

3. Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No

4. Introduction:

- ☒ Presented credentials
- ☒ Explained responsibility to provide accurate information and provided Section 1001 and 1002 U.S.C. to facility
- ☒ Verified presence at correct facility (checked address/I.D. #)
- ☒ Explained authority to conduct inspection (Section 3007 of RCRA)
- ☒ Explained purpose, scope, and order of the inspection; completed Multimedia Screening Checklist.
- ☒ Explained documentation process—worksheets, checklists, photos, notes, statements
- ☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ By facility representative ☐ By other (name): _____
☐ No - Access denied. Name of person denying access: _____
Time of denial: _____

Reason for denial, or limitations placed on access: _____

APPENDIX 1-3.

FACILITY BACKGROUND

1. Site History:

Date facility began operating: 4/25/2004 Number of employees: ~75

Number of shifts/hour worked: Dock 1200-2000 Number of days worked per week: M-F (S)

Size (sq. ft., how divided): Drivers 0900-1700
~23,200 sq ft ; Dock area - 21,000; Office 2,200

Property owner and facility operator the same? ☒ Yes ☐ No

2. Major products or services provided: Transfer station for Freight

3. Major raw materials used: None

4. Major manufacturing or processing operations which generate waste streams (provide brief description, then complete APPENDIX 1-4 for each):

Operation/Process

Waste Stream(s)

See Generator Waste Stream Worksheets

5. Verified/compared above information with facility Notification Form: ☒ Yes ☐ No

Describe updates to the Verification Report: Changed to SQG of ~~USF~~ hazardous waste
Added D001, D007 characteristic waste codes

6. Hazardous Waste Generator Status: (based on records review)

☐ Non-generator

☐ VSQG (0-100 kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1 kg acute waste or 100 kg of acute spill residue)

☒ SQG (100-1000 kg/mo and accumulate <6000 kg)

☐ LQG (>1000 kg/mo or >1 kg/mo of acute waste)

Is facility's status solidly within above category? ☐ Yes ☒ No (describe)

Typically non-generator; LQG 1 month in 2015; SQG 2 months in 2016;
2 months in 2017; VSQG 1 month in 2017

7. TSDF Status: ☐ Treatment ☐ Storage ☐ Disposal ☒ Not applicable

Note: If TSDF, types of units, number of units, capacities, processes, etc.:

8. Resolved questions from Pre-Inspection Worksheet or Compliance Officer? ☐ Yes ☐ No ☒ No Questions

9. Requested site map or diagram to identify all observations? ☒ Yes ☐ None Available

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APPENDIX 1-4.

GENERATOR WASTE STREAMS

1. WASTE STREAM: Damaged Freight HazardousFACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Other ☐ Not done ☐ InadequateWASTE CODES: 0001, 0002, 0007DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ TestingDOCUMENTATION: SDSsGENERATING PROCESS: Freight Moving by Fork Trucks and Transportation DamageGENERATION RATE: Between 198 - 2,625 pounds/episode; 5 since 5/6/2015ON-SITE MANAGEMENT: ☐ In SAAs ☐ Visually inspected? ☒ In storage/Accumulation ☒ Visually inspected?Containerized and/or packaged for shipment in OS&D AreaOFF-SITE MANAGEMENT/DISPOSITION: Transported by Stericycle to Excel (Memphis, TN) or Petrochem Processing (Detroit, MI) for fuel blending, neutralization, or transfer to TSD2. WASTE STREAM: Damaged Freight NonhazardousFACILITY DETERMINATION: ☐ Hazardous ☒ Nonhazardous ☐ Other ☐ Not done ☐ InadequateWASTE CODES: —DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ TestingDOCUMENTATION: SDSsGENERATING PROCESS: Freight moving by fork truck and Transportation damageGENERATION RATE: between 10 - 8,925 pounds/episode; 8 since 8/20/14ON-SITE MANAGEMENT: ☐ In SAAs ☐ Visually inspected? ☒ In storage/Accumulation ☒ Visually inspected?Containerized and/or packaged for shipment in OS&D AreaOFF-SITE MANAGEMENT/DISPOSITION: Transported by Stericycle to TSD facility or disposed into general trash3. WASTE STREAM: Used Oil and Used Oil FiltersFACILITY DETERMINATION: ☐ Hazardous ☐ Nonhazardous ☒ Other ☐ Not done ☐ InadequateWASTE CODES: Marginal as used oil per 40 CFR 279DETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ TestingDOCUMENTATION: —GENERATING PROCESS: Fork Truck MaintenanceGENERATION RATE: ~36 gallons used oil; 24 used oil filters/yearON-SITE MANAGEMENT: ☐ In SAAs ☐ Visually inspected? ☐ In storage/Accumulation ☐ Visually inspected?No accumulation on site; removed by service contractor upon generation (NMC)OFF-SITE MANAGEMENT/DISPOSITION: Transported by NMC to its facility for recycling

4. WASTE STREAM: Spent Lead-Acid Batteries

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Other ☐ Not done ☐ Inadequate

WASTE CODES: D008; managed as lead acid batteries per 40 CFR 266

DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing

DOCUMENTATION:

GENERATING PROCESS: Fork Truck Maintenance

GENERATION RATE: Unknown; not tracked

ON-SITE MANAGEMENT: ☐ In SAAs ☐ Visually inspected? ☐ In storage/Accumulation ☐ Visually inspected?

NO accumulation onsite; removed by service contractor upon generation (NMC)

OFF-SITE MANAGEMENT/DISPOSITION: Transported by NMC to its facility for reclamation

5. WASTE STREAM: Used Alkaline Batteries

FACILITY DETERMINATION: ☐ Hazardous ☒ Nonhazardous ☐ Other ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing

DOCUMENTATION:

GENERATING PROCESS: Facility Equipment Maintenance

GENERATION RATE: Unknown; not tracked

ON-SITE MANAGEMENT: ☐ In SAAs ☐ Visually inspected? ☐ In storage/Accumulation ☐ Visually inspected?

Disposed into general trash

OFF-SITE MANAGEMENT/DISPOSITION: Transported by Waste Management to Cedar Rapids Landfill for disposal

6. WASTE STREAM: General Trash

FACILITY DETERMINATION: ☐ Hazardous ☒ Nonhazardous ☐ Other ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

DOCUMENTATION:

GENERATING PROCESS: All other solid waste; not recyclable

GENERATION RATE: ~~Not tracked. contractor called as needed~~ ^{WPS} 2,600-yd/week

ON-SITE MANAGEMENT: ☐ In SAAs ☐ Visually inspected? ☐ In storage/Accumulation ☐ Visually inspected?

Transferred to 6-cu-yd trash compactor

OFF-SITE MANAGEMENT/DISPOSITION: Transported by waste management to Cedar Rapids Landfill for disposal

APPENDIX 1-6. RECORDS REVIEW

B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

1. Has the generator episodically generated >1,000 kg of hazardous waste or 1 kg of P-listed waste per month
☐ Yes, complete **APPENDIX 2-2.B** to determine generator status ☐ No, continue with **APPENDIX 1-6.B**
2. Is all hazardous waste reclaimed under a contractual agreement? ☐ Yes ☒ No, go to **APPENDIX 1-6.B.1**
3. If yes, is the type of waste and frequency of shipments specified in the agreement?
☐ Yes, continue ☐ No, go to **APPENDIX 1-6.B.1**
4. If yes, is the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator owned and operated by the reclaimer of the waste?
☐ Yes, continue ☐ No, go to **APPENDIX 1-6.B.1**
5. If yes, does the generator maintain a copy of the reclamation agreement in its files for a period of at least 3 years after termination or expiration of the agreement?
☐ Yes, does the generator maintain the LDR Notice for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement? ☐ Yes ☐ No, cite for **268.7(a)(10)**
☐ No, go to **APPENDIX 1-6.B.1**

B.1. Manifests

#	V/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.	✓	Uses manifest system- 262.20(a)(1)	
2.	✓	Maintains manifests for 3 years- 262.40(a)	
3.	✓	Has EPA I.D. number- 262.20(a)	
4.	✓	Has generator name, address, phone number on manifest- 262.20(a)	
5.	✓	Has transporter(s) name & EPA I.D. number on manifest- 262.20(a)	
6.	✓	Has designated facility name, address & EPA I.D. number on manifest- 262.20(a)	
7.	NA	Designates alternate facility on manifest (optional)- 262.20(c)	
8.	✓	Has unique pre-printed manifest tracking number and number of pages on manifest- 262.20(a)	
9.	✓	Has DOT shipping name, hazard class, waste code, and reportable quantity (RQ) (if required by 49 CFR 172) on manifest- 262.20(a)	
10.	✓	Has number, type, quantity, unit wt/vol. of containers on manifest- 262.20(a)	
11.	✓	Has proper certification including waste minimization on manifest- 262.20(a)	
12.	✓	Signs and dates manifest and has transporter sign and date manifest- 262.23(a)	

#	V/X/NA	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
13.	NA	Submits exception report if necessary- 262.42	
14.	✓	Sends LDR notification/certification with manifests on first shipment- 262.16(b)(7)→268.7(a)(2)	
15.	✓	Includes manifest number, correct EPA waste codes & treatment standards, and waste analysis data on LDR notification/certification- 262.16(b)(7)→268.7(a)(2)	
16.	✓	Maintains LDR notification/certification/waste analysis data and other documents for 3 years- 262.16(b)(7)→268.7(a)(8)	

✓ - in compliance

X - not in compliance

NA - not applicable

17. Approximate number of manifests generated since last inspection, or over past 3 years: 5

18. Approximate number of manifests reviewed: 5

19. Copies of manifests made? ☒ YES ☐ NO

B.2. Waste Analysis/Waste Determination and Land Disposal Restrictions

1. Location of waste analysis/waste determination records: Liz Frazier office

2. Person responsible for waste analysis/waste determination: Jeff Sexton

#	V/X/NA	REGULATORY REQUIREMENTS	COMMENTS
3.	✓	Does not dilute waste impermissibly to meet LDR standards- 262.16(b)(7)→268.3(a) & (b)	
4.	✓	Determines if waste is a hazardous waste at the point of generation before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors- 262.11(a)	
5.	✓	Determines whether a waste meets any of the listings in 40 CFR 261 Subpart D- 262.11(c)	
6.	✓	Determines whether a waste exhibits any of the characteristics identified in 40 CFR 261 Subpart C- 262.11(d)	
7.	✓	Identifies all applicable EPA hazardous waste numbers- 262.11(g)	
8.	✓	Maintains records supporting hazardous waste determinations for at least 3 years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal- 262.11(f)	
9.	✓	Documents waste determination, including results of any tests, sampling, waste analyses, or other determinations; documentation of tests, sampling, and analytical methods; descriptions or processes, waste composition, and waste properties; and records which explain the knowledge basis- 262.11(f)	
10.	✓	Determines waste does <u>not</u> meet applicable treatment standards (ATS)- 262.16(b)(7)→268.7(a)(2)	

#	V/X/NA	REGULATORY REQUIREMENTS	COMMENTS
11.	✓	Submits a one-time written notice to TSDF with initial shipment and a copy placed in file- 262.16(b)(7)→268.7(a)(2)	
12.	NA	Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition- 262.16(b)(7)→268.5 & 6 (Describe the variance, extension, or petition that applies)	
13.		If waste is shipped off site for disposal, provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs- 262.16(b)(7)→268.7(a)(4)	
14.		If waste is shipped off site for disposal, provides a notice with initial shipment, or new notification, if changes occur- 262.16(b)(7)→268.7(a)(2)	
15.		If waste is shipped off site for disposal, includes on the LDR notice: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable- 262.16(b)(7)→268.7(a)(2) and (a)(4)	
16.		If waste is determined waste to be excluded from the definition of hazardous or solid waste, retains a one-time notice describing generation, subsequent exclusion or exemption, and disposition of the waste, in the facility's on-site files- 262.16(b)(7)→268.7(a)(7)	
17.		If generator determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment, submits a one-time written notice to TSDF with initial shipment and a copy placed in file- 262.16(b)(7)→268.7(a)(3)(i)	
18.		If waste is not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)- 262.16(b)(7)→268.9(a)	
19.		If waste is land disposed, determines if waste meets the treatment standards specified in 268 Subpart D- 262.16(b)(7)→268.9(c)	
20.		If claiming that their characteristic waste is no longer hazardous, sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation, or receiving facility- 262.16(b)(7)→268.9(d)	

V - in compliance X – not in compliance NA – not applicable

If hazardous waste prohibited from land disposal is any of the following: a contaminated soil, or a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge, complete additional LDR checklists in **APPENDIX 2-1**

21. Notes/Observations: _____

B.3. Preparedness/Prevention and Training

#	✓/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.	✓	Designates an emergency coordinator and that person is on site or on-call- 262.16(b)(9)(i)	
2.	✓	Posts emergency coordinator's name and phone number, fire department's phone number, and locations of fire extinguishers and spill control equipment near the phone- 262.16(b)(9)(ii)	
3.	✓	Makes arrangements with local emergency agencies- 262.16(b)(8)(vi)(A)	
4.	✓	Familiarizes coordinating agencies with layout, waste types, access points, evacuation routes, and likely casualty types- 262.16(b)(8)(vi)(A)(2)	
5.	✓	In the event of more than one responding FD or PD, designates a primary agency - 262.16(b)(8)(vi)(A)(3)	
6.	✓	Maintains records documenting arrangements with response agencies- 262.16(b)(8)(vi)(B)	
7.	✓	In the event of a fire or spill, immediately responds or coordinates with a response agency or contractor- 262.16(b)(9)(iv)	
8.	✓	Familiarizes all employees with waste handling and emergency procedures relevant to their responsibilities- 262.16(b)(9)(iii)	

✓ - in compliance X – not in compliance NA – not applicable

9. Notes/Observations: _____

B.4. Re-Notification (effective 2021)

#	✓/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.	NA	Renotifies EPA of hazardous waste activity every 4 years by September 1- 262.18(d)(1)	

APPENDIX 1-7. VISUAL REVIEW

B. SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

B.1. Required Response Equipment and Hazard Management

Note: Per 262.15(a)(7), this equipment must be available even if waste is accumulated only in SAAs.

#	✓/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.	✓	Operates to minimize possibility of a fire, explosion, or release- 262.16(b)(8)(i)	
2.	✓	Provides an internal communications or alarm system- 262.16(b)(8)(ii)(A)	
3.	✓	Provides device available for and capable of summoning emergency assistance- 262.16(b)(8)(ii)(B)	
4.	✓	Provides adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)- 262.16(b)(8)(ii)(C)	
5.	✓	Provides adequate water supply for fire control equipment- 262.16(b)(8)(ii)(D)	
6.	✓	Tests and maintains communication and emergency equipment- 262.16(b)(8)(iii)	
7.	✓	Has communication equipment immediately accessible when waste is being handled- 262.16(b)(8)(iv)(A)	
8.	✓	Has communication equipment immediately accessible when only one person present on site- 262.16(b)(8)(iv)(B)	
9.	✓	Provides adequate aisle space for type of waste management and emergency equipment used- 262.16(b)(8)(v)	

✓ - in compliance X – not in compliance NA – not applicable

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B.2. Container Accumulation Area (CAA)

1. Name O sand D Area

(Complete one form per CAA)

2. Type of accumulation: ☐ <180 day ☒ <270 day

#	V/X/NA	REGULATORY REQUIREMENTS	COMMENTS
3.	✓	Uses containers that are in good condition- 262.16(b)(2)(i)	
4.	✓	Uses containers that are compatible with waste- 262.16(b)(2)(ii)	
5.	✓	Keeps containers closed- 262.16(b)(2)(iii)(A)	
6.	✓	Does not open, handle, or manage containers in a manner to cause them to leak- 262.16(b)(2)(iii)(B)	
7.	✓	Inspects CAA weekly- 262.16(b)(2)(iv)	
8.	✓	Does not put incompatible wastes in the same container- 262.16(b)(2)(v)(A)	
9.	✓	Does not put wastes in an unwashed container that previously held an incompatible waste- 262.16(b)(2)(v)(B)	
10.	✓	Separates containers of incompatible waste or protects them from each other- 262.16(b)(2)(v)(C)	
11.	X	Labels containers as "Hazardous Waste"- 262.16(b)(6)(i)(A)	NOPF Fixed on-site
12.	X	Labels containers with an indication of the nature of the hazard- 262.16(b)(6)(i)(B)	NOPF Fixed on-site
13.	X	Marks containers with accumulation start dates- 262.16(b)(6)(i)(C)	NOPF Fixed on-site
PRE-TRANSPORT REQUIREMENTS			
14.	✓	Packs, labels, and marks container per DOT requirements- 262.30, 262.31, 262.32, respectively	
15.	✓	Provides placards for use by transporters when applicable- 262.33	
16.	✓	Marks containers with all applicable EPA hazardous waste numbers- 262.11(g)	

✓ - in compliance X - not in compliance NA - not applicable

17. Container inventory: ☒ Actual Count ☐ Approximate count

Waste Type	Oldest Date	Volume per Container	# of Containers	Total Volume
RooA-Tek D001	7-6-2017 (not dated)	5-gallons	5	25 gallons

Total Quantity (pounds, gallons, etc.): 25 gallons

18. How were container volumes verified? Visual

19. Container management area location noted on map or diagram: ☒ YES ☐ NO

20. Notes/Observations: _____

APPENDIX 1-7.

VISUAL REVIEW

E. USED OIL

Complete APPENDIX 1-4 to describe used oil waste streams.

E.1. Prohibitions

#	✓/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.	NA	Complies with all 40 CFR 264 or 265 requirements for surface impoundments and waste piles utilized to manage used oil- 279.12(a)	
2.	NA	Does not utilize used oil as a dust suppressant- 279.12(b)	
3.	NA	Burns off-specification used oil fuel for energy recovery only in industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part- 279.12(c)(1-3)	

✓ - in compliance X - not in compliance NA - not applicable

Used oil activities:

<input checked="" type="checkbox"/> Generator	Complete this section
<input type="checkbox"/> Collection Centers and Aggregation Points (40 CFR 279 Subpart D)	Complete this section
<input type="checkbox"/> Transporters and Transfer Centers (40 CFR 279 Subpart E)	Complete Appendix 2-5.A
<input type="checkbox"/> Processors and Re-Refiners (40 CFR 279 Subpart F)	Complete Appendix 2-5.B
<input type="checkbox"/> Burners Who Burn Off-Specification Used Oil for Energy Recovery (40 CFR 279 Subpart G)	Complete Appendix 2-5.C
<input type="checkbox"/> Used Oil Fuel Marketers (40 CFR Subpart H)	Complete Appendix 2-5.D

E.2. Standards for Used Oil Generators and Used Oil Collection/Aggregation Points

For collection centers and aggregation points, citation is 279.30(b), 279.31(b)(1), or 279.32(b) referencing citation below.

#	✓/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.	NA	If not a VSQG, manages mixtures of hazardous waste and used oil according to 279.10(b)-cite 262.11 for deficiency	Used oil and used oil filters transported off-site upon generation by service contractor. No storage on-site.
2.	NA	Rebuts the presumption that listed hazardous waste has been mixed with used oil for used oil containing more than 1,000 ppm total halogens- cite 262.11 for deficiency	
3.	NA	Stores used oil only in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265- 279.22(a)	
4.	NA	Stores used oil in containers and ASTs that are (1) in good condition and (2) have no visible leaks- 279.22(b)(1) and (b)(2)	
5.	NA	Labels containers and ASTs "Used Oil"- 279.22(c)(1)	

#	V/X/NA	REGULATORY REQUIREMENTS	COMMENTS
6.	NA	Labels or marks fill pipes used for underground tanks as "Used Oil"- 279.22(c)(2)	
7.	NA	Upon detection of a release, (1) stops the release, (2) contains the release, (3) cleans up and manages used oil and other materials, and (4) repairs or replaces the containers or tanks prior to returning them to service, if necessary- 279.22(d)(1) through (d)(4)	
8.	NA	Burns only its own or household DIY used oil-go to APPENDIX 2-5.C for deficiency	
9.	NA	Burns used oil in a < 0.5M BTU/hr space heater that is vented to ambient air-go to APPENDIX 2-5.C for deficiency	
10.	NA	If no tolling agreement, ensures that used oil is transported only by a transporter that has obtained an EPA ID number- 279.24	
11.	NA	If tolling agreement is in place, includes in the contract the following: (1) type of used oil and frequency of shipments, (2) requirement that the vehicle transporting the used oil to and from generator is owned by the processor/re-refiner, and (3) requirement that the reclaimed oil will be returned to generator- 279.24(c)(1) through (c)(3)	
12.	NA	Transports its own used oil in its own vehicles, in quantities less than 55 gallons at a time, to a recognized used oil collection center- 279.24(a)/go to APPENDIX 2-5.A FOR DEFICIENCY	
13.	NA	Transports its own used oil in its own vehicles, in quantities less than 55 gallons at a time, to an aggregation point owned by generator- 279.24(b)/go to APPENDIX 2-5.A FOR DEFICIENCY	

V - in compliance X - not in compliance NA - not applicable

E.3. Standards for Used Oil Collection/Aggregation Points

#	V/X/NA	REGULATORY REQUIREMENTS	COMMENTS
1.	NA	Has registered with or received a license from the local or state government- 279.31(b)(2)	

V - in compliance X - not in compliance NA - not applicable

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APPENDIX 1-8. EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No

NA ☐ Identified/verified that violations from previous inspection were corrected (if applicable)

☒ Addressed all unresolved inspection-related issues

☒ Summarized findings and observations for the facility representatives

WPJ NOV ☒ NOV issued? ☒ Yes ☐ No ☒ Violations identified and explained, including circumstances, location, and regulations

☒ Explained importance of a timely (14-day) and adequate response

☒ Explained that findings and observations are based on your current knowledge of RCRA, and that final findings may differ

☒ Explained that compliance officer will make final decisions and that all compliance questions should be directed toward the compliance officer

☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions

☒ Provided facility with CBI form

☒ Prepared Document Receipt form

☒ Provided compliance assistance materials

3. Specific information requested from facility? ☒ Yes ☐ No

4. Facility appears to have awareness of RCRA regulations? ☒ Yes ☐ No

5. Facility has its own environmental staff? ☐ Yes ☒ No

6. Facility has copy of applicable regulations? ☒ Yes ☐ No

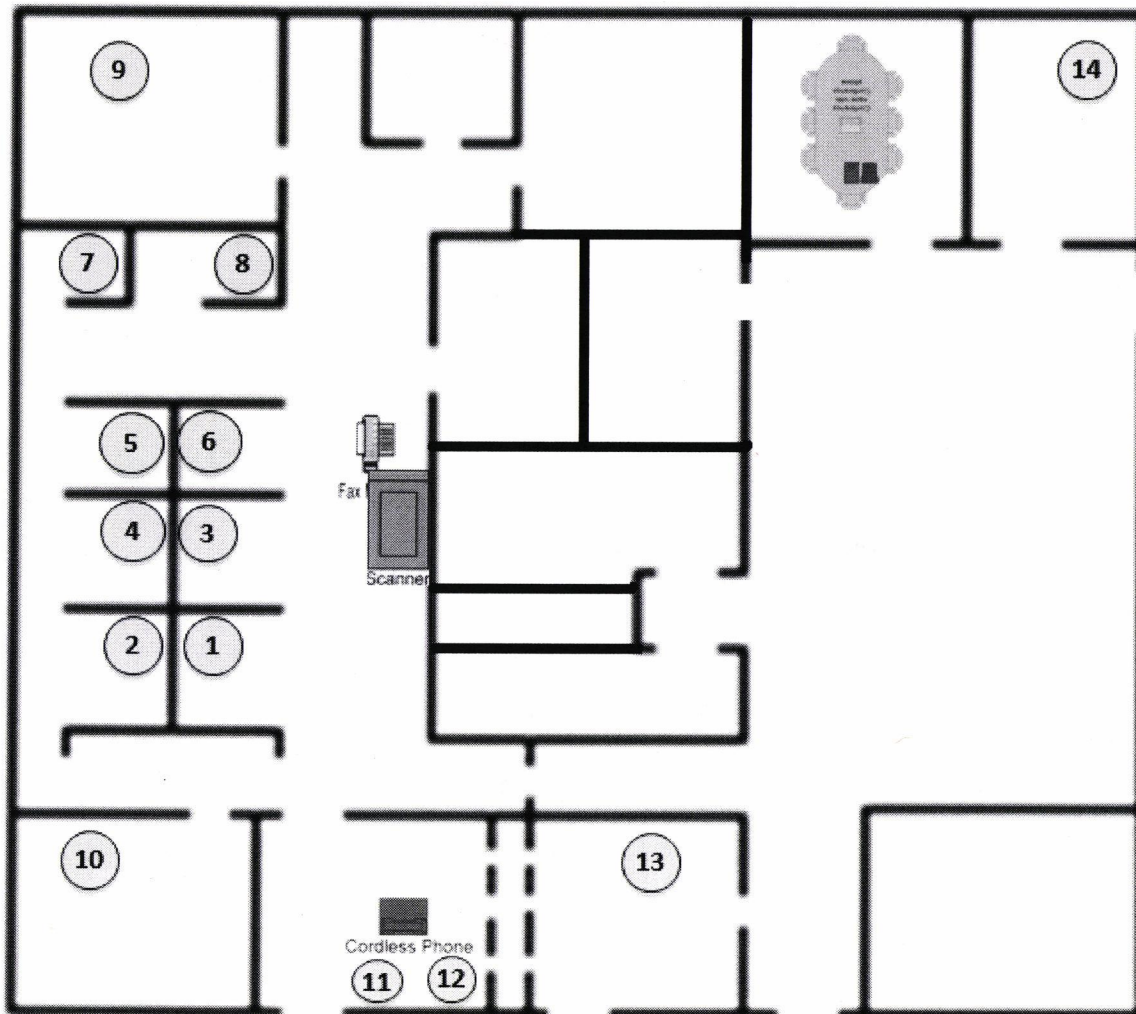
7. Attitude and demeanor of facility representative(s); ☒ OK ☐ Not OK

8. Notes/Observations: _____

Dean Jackson

Subject:

XPO Office areas

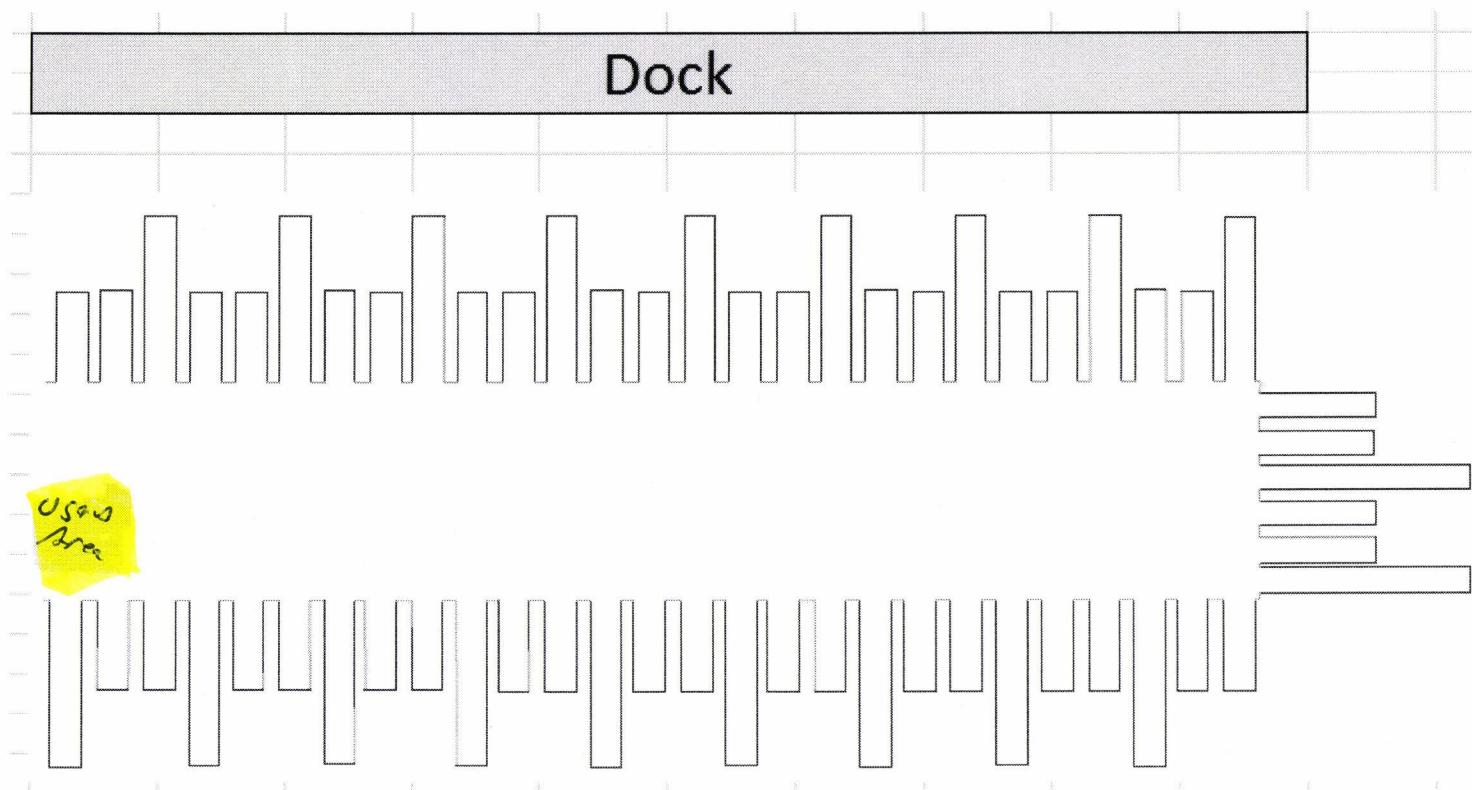


OS90 Area

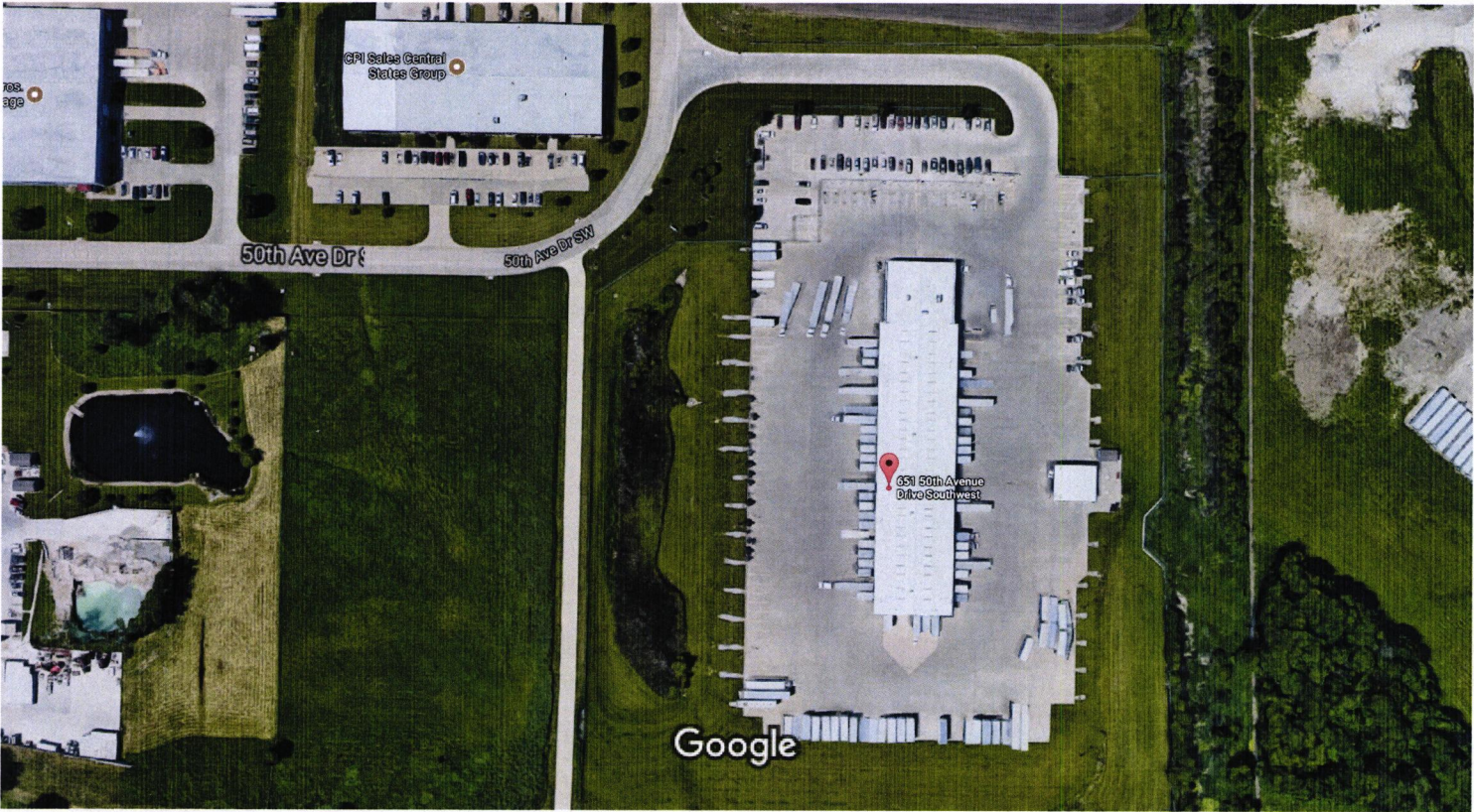
Dean Jackson

Subject:

H/M Dock Area



651 50th Ave Dr SW



Imagery ©2017 Google, Map data ©2017 Google United States 100 ft



651 50th Ave Dr SW
Cedar Rapids, IA 52404



At this location

Xpo Logistics



Safety Data Sheet

EMERGENCY CONTACTS

Spills, leaks, fire or exposure call Chemtrec: (800) 424-9300

SECTION 1 – CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name:	Poly-Sil 2200 Series	HMIS® Rating:	Health	2
Product Use:	Silicone Roof Coating		Flammability	2
Company:	COATING & FOAM SOLUTIONS, LLC		Reactivity	0
	1100 Cottonwood Ave. Suite 300		Personal Protection	X
	Hartland, WI 53029			
	(888) 284-7488			

0= Minimal 1=Slight 2=Moderate 3=Serious 4=Severe

SECTION 2 – COMPOSITION / INFORMATION ON INGREDIENTS

Reportable components	CAS number	Vapor Pressure Mm Hg @ TEMP	Weight Percent (+/-2%)
Crystalline Silica	14808-60-7	N/A	31
OSHA PEL: TWA 10 mg/M3 (as respirable dust only - not in liquid product state)			
ACGIH TLV: TWA 0.025 mg/M3 (as respirable dust only - not in liquid product state)			
Petroleum Hydrocarbon Distillates	64742-47-8	<1 @ 20°C	<17
OSHA TWA: 500 ppm 8 hrs.			
ACGIH TWA: 100 ppm 8 hrs.			
Methyl Oximino Silane	22984-54-9	<0.1 mbar @ 68°F	< 5
OSHA PEL: N/E (not established)			
ACGIH PEL: N/E			

SECTION 3 – HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

Health Hazards: Irritating to eyes, respiratory system and skin. Common irritation symptoms- headache, nausea, nose and throat irritation-may result from overexposure.

Other Precautions: Product evolves methyl ethyl ketoxime (MEKO) when exposed to water or humid air. Provide ventilation during use to control MEKO within the exposure guidelines or use respiratory protection.

Appearance: Viscous Liquid

Odor: Petroleum odor

Read the entire MSDS for a more thorough assessment to the hazard information on this product.

SECTION 4 – FIRST AID MEASURES

General: In case of accident or if you feel unwell, seek medical advice IMMEDIATELY. (Show the label where possible.)

Eye contact: In case of contact, flush eyes with large amounts of running water for at least 15 min. Hold eyelids apart to ensure rinsing of the entire surface of the eye and lids with water. Get medical attention.

Skin Contact: Remove as much of the material as possible using mechanical/waterless methods before washing with water. Seek medical attention for any burns or irritation resulting from contact with cure by-products.

Inhalation: If inhaled, remove to fresh air and provide oxygen if breathing is difficult. Give artificial respiration if not breathing. Get medical attention.

Ingestion: Never give an unconscious person anything to drink. If unconscious, treat for shock. Notify a physician or the nearest poison control center immediately. If conscious, have the person rinse his mouth with cold water. Do not attempt to induce vomiting (vomiting may occur naturally, but should be avoided if possible). If unconscious and vomiting, turn the person to his side to avoid choking.

SECTION 5 – FIRE-FIGHTING MEASURES

Fire and Explosion Hazards: This product is considered combustible and is a fire hazard. It supports combustion and decomposes under fire conditions to give off toxic materials. Do not pour, spill or store near heat, spark sources or open flame.

Extinguishing Media: Use foam, dry chemical, CO₂, or water.

Fire Fighting Procedures: As appropriate for surrounding materials/equipment. If electrical equipment is involved, the use of foam should be avoided. Use water spray to cool non-involved containers.

Fire Fighting Protective Equipment: Wear self-contained breathing apparatus with a full-face piece operated in the positive pressure demand mode and full protective clothing (Bunker Gear) when fighting fires.

Flash Point: >108 °F

Method Used: TCC

SECTION 5 – FIRE-FIGHTING MEASURES - continued

Flammable Limits in Air by Volume (Lower): 1.1

Flammable Limits in Air by Volume (Upper): 5.0

Rate of Burning: N/A

Explosive Power: N/A

Sensitivity to Static Discharge: Slight

Combustion Products: Carbon monoxide, carbon dioxide, nitrogen oxides

SECTION 6 – ACCIDENTAL RELEASE MEASURES

For major spills call Chemtrec (800-424-9300).

Spills, Leaks, or Releases: Remove all sources of ignition. Ventilate area. Absorb spill with absorbent material such as sawdust, vermiculite or sand, and place in a closed container. In case of large spill, dike the area to prevent this material from entering water systems or sewers. (See section 12: Disposal Considerations)

SECTION 7 – HANDLING AND STORAGE

Handling: Avoid breathing aerosols, spray mists and heated vapors. Avoid prolonged or repeated skin contact. (See Section 8—Exposure Control for details).

Storage Requirements: Keep containers properly sealed when stored indoors, in a cool well-ventilated area. Keep contents away from moisture. Keep away from heat, sparks and open flame. As standard practice, never use welding or cutting torch on or near any container (even empty) as an explosion may occur. Care should be taken to prevent moisture condensation in the container.

Storage Temperature: Avoid storage above 100°F.

SECTION 8 – EXPOSURE CONTROLS/PERSONAL PROTECTION

PREVENTATIVE MEASURES:

Conditions of use, adequacy of engineering or other control measures, and actual exposures will dictate the need for specific protective devices at your workplace.

Work / Hygienic Practices: Use good personal hygiene practices. Wash hands before eating, drinking, smoking, or using toilet facilities. Promptly remove soiled clothing and wash thoroughly before reuse. Shower after work, using plenty of soap and water. Open containers of food and beverages should be kept away from areas where the product is used or stored. Eating, drinking, smoking and application of cosmetics should be prohibited in areas where the product is being used.

Engineering Controls: Provide sufficient mechanical (general and/or local exhaust) ventilation to maintain exposure below TLV(s). General ventilation is recommended. Additional local exhaust ventilation is recommended where vapors, mists, or aerosols may be released.

Personal Protective Equipment:

Eye Protection: Wear protective eyeglasses or chemical safety goggles, per OSHA eye and face-protection regulations (29 CFR 1910.133). Contact lenses are not eye protection devices. Appropriate eye protection must be worn instead of, or in conjunction with contact lenses.

Skin Protection: Wear chemical resistant gloves. Wear protective clothing to prevent skin contact. Keep exposed skin area to a minimum. Eye wash station and safety shower should be available.

Respiratory Protection: If exposure can exceed the PEL/TLV, use only NIOSH/MSHA approved air purifying or supplied air respirator operated in a positive pressure mode per the NIOSH/OSHA occupational health guidelines for chemical hazards. If it is possible to generate significant levels of vapors or mists, a NIOSH approved or equivalent respirator is recommended.

SECTION 9 – PHYSICAL AND CHEMICAL PROPERTIES

Appearance: (Color - White, Lt Grey, Dark Grey, Tan) viscous liquid

Odor: Petroleum odor.

Flash Point: >108°F

Vapor Pressure (mm Hg at 20°C): Not Determined

Vapor Density (Air=1): Heavier than air

Boiling Point: 310 - 385°F

Melting Point: Not Determined

Solubility (Water): Negligible

Specific Gravity: (H₂O=1) 1.23

Evaporation Rate: Slower than ether

VOC: <250 Grams/Liter EPA Method 24

SECTION 10 – STABILITY AND REACTIVITY

Hazardous Decomposition or Byproducts: By high heat or fire: Carbon Monoxide, Oxides of Nitrogen and various hydrocarbon fragments.

Chemical Stability: This is a stable product.

Conditions to Avoid: Keep away from heat, sparks, or flames.

Incompatibility with other Substances: Avoid strong oxidizing agents, concentrated nitric and sulfuric acids, halogen, and molten sulfur.

Hazardous Polymerization: Will not occur.

SECTION 11 – TOXICOLOGICAL INFORMATION

POTENTIAL HEALTH EFFECTS:

No significant exposure to any ingredient is thought to occur during use in which the ingredients are bound to other materials in the liquid state as in paints and coatings.

Component Toxicology Information: Methyl ethyl ketoxime (MEKO) is formed upon contact with water or humid air. Male rodents exposed to MEKO vapor throughout their lifetime developed liver tumors. Since many commonly used chemicals cause liver tumors in rats and mice, additional testing is planned by the MEKO supplier to determine any relevance to humans. Until more data is known exposure levels should be maintained as low as achievable.

Inhalation: Short-term inhalation toxicity is low. Breathing small amounts during normal handling is not likely to cause harmful effects. Breathing large amounts may be harmful.

Symptoms are more likely seen at air concentrations exceeding the recommended exposure limits. Symptoms of exposure may include: Irritation (nose, throat, and respiratory tract), metallic taste in mouth, impaired coordination, confusion, CNS depression (dizziness, drowsiness, weakness, fatigue, nausea, headache, and unconsciousness).

Skin Contact: Exposure causes skin irritation. Prolonged or repeated exposure may dry the skin. Symptoms may include redness, burning, drying and cracking. Skin absorption is possible, but harmful effects are not expected from this route of exposure under normal conditions of handling and use.

Eye Contact: Exposure to liquid or vapor causes eye irritation. Symptoms may include stinging, tearing, and swelling.

Ingestion: Single dose or oral toxicity is low. Swallowing small amounts during normal handling is not likely to cause harmful effects. Swallowing large amounts may be harmful.

Symptoms may include: Gastrointestinal irritation (nausea, vomiting, and diarrhea) and possible liver damage. This material can enter the lungs during swallowing or vomiting and cause lung inflammation and/or damage.

Medical Conditions Generally Aggravated by Exposure: May aggravate pre-existing respiratory and skin disorders.

Chronic Effects: Prolonged or repeated skin contact may cause dryness, defatting, and dermatitis.

Carcinogenicity: The ingredients of this product are known to the state of California to be carcinogenic. The ingredients of this product are not classified as carcinogenic by ACGIH or IARC, not regulated as carcinogens by OSHA, and not listed as carcinogens by NTP. No significant exposure to any ingredient is thought to occur during the use in which the ingredients are bound to other materials in the liquid state as in paints and coatings.

Mutagenicity: There is no substantial evidence of mutagenic potential.

SECTION 12 – DISPOSAL CONSIDERATIONS

This product has been tested and found to have a flash point below 140°F. If discarded in liquid form, this product may be treated as hazardous waste based on the characteristic of ignitability as defined under the federal RCRA regulations (40 CFR 261).

For further, information contact your state or local solid waste agency or the United States Environmental Protection Agency's RCRA hotline (1-800-434-9300 or 202-382-3000). Chemical waste, even small quantities should never be poured down drains, sewers or waterways. Empty containers should be decontaminated and either passed to an approved drum recycler or destroyed.

SECTION 13 – TRANSPORT INFORMATION

DOT: Roof Coating, Not Regulated.

(49CFR: Applicable for domestic transportation by highway and rail, but not air or vessel) (See 49CFR 173.150(F)(1).

Non bulk packaging (less than 119 gallons), material ships as non-regulated. (See 49CFR 173.150(F)(2).

Transportation Emergency Telephone Number: 1-800-424-9300 (CHEMTREC)

SECTION 14 – REGULATORY INFORMATION

OSHA: Not Regulated

TSCA (Toxic Substances Control Act) Regulations: This material or its components are listed on the TSCA Chemical Substance Inventory and is in compliance with all applicable rules and orders. One or more of the components may be exempt from listing on the TSCA Inventory.

SARA: This material does not contain any substances in the list of Toxic Chemicals subject to Section 313 of the Superfund Amendments and Reauthorization Act of 1986 (SARA Title III), in excess of the applicable de minimis concentrations as specified in Section 372.38 (a).

State Right to Know Information

The following chemicals are specifically listed by individual states; other specific health and safety data in other sections of the MSDS may also be applicable for state requirements. For details on your regulatory requirements you should contact the appropriate agency in your state.

MA right to know Extraordinarily Hazardous Substance List:

<u>Reportable Component</u>	<u>CAS No</u>	<u>Weight % (\pm 2%)</u>
Crystalline Silica	14808-60-7	31 (as respirable dust only, not while in liquid form)

California Proposition 65: Warning: This product contains chemicals known to the state of California to be Carcinogenic.

<u>Reportable Component</u>	<u>CAS No</u>	<u>Weight % (\pm 2%)</u>
Crystalline Silica	14808-60-7	31 (as respirable dust only, not while in liquid form)

SECTION 15 – OTHER INFORMATION

Glossary:

- ACGIH- American Conference of Governmental Industrial Hygienist
- IARC- International Agency for Research on Cancer
- MSHA- Mine Safety and Health Administration
- NIOSH- National Institute for Occupational Safety and Health
- NTP- National Toxicology Program
- OSHA- Occupational Safety and Health Administration

For Your Protection: Coating & Foam Solutions, LLC. (CFS) warrants only that its products meet the specifications stated in the sales contract. Typical properties, where stated, are to be considered as representative of current production and should not be treated as specifications. While all the information presented in this document is believed to be reliable and to represent the best available data on these products, NO GUARANTY, WARRANTY, OR REPRESENTATION IS MADE, INTENDED, OR IMPLIED AS TO THE CORRECTNESS OR SUFFICIENCY OF ANY INFORMATION, OR AS TO THE MERCHANTABILITY OR SUITABILITY OR FITNESS OF ANY CHEMICAL COMPOUNDS OR OTHER PRODUCTS OR THE USE THEREOF ARE NOT SUBJECT TO A CLAIM BY A THIRD PARTY FOR INFRINGEMENT OF ANY PATENT OR OTHER INTELLECTUAL PROPERTY RIGHT. THE USER SHOULD CONDUCT SUFFICIENT INVESTIGATION TO ESTABLISH THE SUITABILITY OF ANY PRODUCT FOR ITS INTENDED USE. Liability of CFS for all claims, whether arising out of breach of warranty, negligence, strict liability, or otherwise, is limited to the purchase price of the material. Products may be toxic and require special precautions in handling. For all products listed, the user should obtain detailed information on toxicity, together with proper shipping, handling, and storage procedures, and comply with all applicable safety and environmental standards. Toxicity and risk characteristics of chemical compounds and other products may differ when used with other materials or in a manufacturing or other process. Those risk characteristics should be determined by the user and made known to handlers, processors, and end users.

End of Data Sheet

HAZARDOUS WASTE

STATE AND FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S.
ENVIRONMENTAL PROTECTION AGENCY OR THE CALIFORNIA DEPARTMENT OF HEALTH
SERVICES

DATE DEEMED WASTE 7/6/17 EPA ID# IAR000515635

CONTAINER ID# 23461 GENERATOR INFORMATION

NAME XPO Logistics

ADDRESS 651 50th Ave Dr. SW

CITY Cedar Rapids STATE IA ZIP 52404

DOT PROPPER SHIPPING NAME _____

UN1139 Waste Coating Solution. 3. PG III

HAZARD PROPERTIES ☒ FLAMMABLE ☐ TOXIC
☐ CORROSIVE ☐ REACTIVE ☐ OTHER _____

**THIS MATERIAL HAS BEEN DEEMED A WASTE AND
CANNOT BE TRANSPORTED BY XPO**

HANDLE WITH CARE!

XPOLogistics

CHI-001L



XPO LOGISTICS

Facility Name

Advanced

Liz Log Off

☒ XPO Logistics Freight, Inc. - XCR

Gas Brand: 651 50th Ave Dr SW
(unknown) Cedar Rapids, IA 52404-5007
State ID: 319-363-6513
2005000039
UST
Registered: 1

County: Linn County
Status: Software Only
Internal ID: (none)
ATG: 166.156.58.120, 60E2528E
Facility Groups: Fueling Location, HWZ
Vendor OSI, Kansas City District, LQG,
Polling, Storm water permit, Western
Region, <Global>

Facility Info

Container Detail

Operational Compliance

Activities

Permit

Invoice

Container Inventory

Electronic Files

ATG Management

E-Processing

Active Containers									
Completed Containers									
Show <input type="text" value="25"/> items		Search: <input type="text"/>							
Container ID #	PRO #	Alert #	Status	Location	Waste Type	Date Deemed Waste	Days on Hand	Scheduled Pick Up Date	
XPO Logistics Freight, Inc. - XCR - 023461	522379712	522379712	Pending Analysis	Waste Area	Hazardous Waste	7/6/2017	75	8/31/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 025255		58787	Awaiting Pickup	Waste Area	Regulated Medical Waste	8/14/2017	36		
Showing 1-2 of 2 item(s)						First	Previous	1	Next Last

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XPO Logistics - XCR
651 50th Ave Dr SW
Cedar Rapids, IA 52404

EMERGENCY ACTION PLAN

Fire Department	911
Police Department	911
Corporate Security	866-229-5200

Types of emergencies that could reasonably be encountered are explosion, chemical releases (harmful gases, liquids or substances), fires, blizzards, tornadoes and, in an extreme condition, floods or earthquakes.

FIRES / EXPLOSIONS
CHEMICAL RELEASES / ACTS OF TERRORISM:

The loudspeaker (PA) and intercom phone system will be used to instruct all occupants of an emergency evacuation. In the event of a fire emergency the fire protection warning system will sound along with strobe warning lights identifying a fire emergency. If the emergency deems it necessary to evacuate the premises, Service Center Manager, Freight Operations Supervisors will assist in the evacuation. A Manager or Supervisor will account for all personnel on duty using an employee roster list and call 911.

Exiting the dock platform: All persons on the dock should exit the building using one of the stairway areas located on North side and 3 sets of stairs and the dock ramp located on the Southside of the dock or whichever leads away from the danger. Trailer dock door ladders can be used as needed to evacuate the area. Employees are to assemble in the employee parking lot or other designated safe site.

Exiting the office: All persons in the office area should exit the building using the front exit. In the event that you are unable to exit through the front exit, you may exit out through the dispatch office and exit through a dock platform exit listed above.

TORNADOS:

In the event of a tornado, all employees are to assemble in the men's and women's toilets / locker rooms. A Supervisor will account for all personnel on duty using an employee roster list. Take cover under tables and desks to prevent head injuries and wait until the "all clear" is given by the supervisor on duty, or emergency authorities. Do not attempt to try and out run a tornado. Follow instructions from the supervisor or his / her designated representative.

BLIZZARDS:

In the event of a blizzard, employees should seek protection from exposure to extreme cold. Try not to expose bare skin to extreme cold. Seek shelter as soon as possible. If able, employees should assemble in the main office away from windows and doors. Follow instructions from the supervisor on duty or his / her representative.

FLOODS:

In the extreme case of a flood, all personnel will evacuate the building according to the evacuation plan where practicable and seek shelter on higher ground.

EARTHQUAKES:

In the event of an earthquake, all employees will evacuate the building, according to the evacuation plan (showing the nearest exit) and assemble in the employee parking lot located at the front of the office on the south side of the lot. The Supervisor on duty will be responsible for accounting for all personnel.

OTHER EMERGENCIES:

In the event of any unforeseen or unusual emergency, employees should follow the instructions of the supervisor on duty or his / her designated representative.

ALL EMPLOYEES MUST FAMILIARIZE THEMSELVES WITH THE EMERGENCY ACTION AND FIRE PROTECTION PLANS. SHOULD AN EMPLOYEE HAVE A QUESTION REGARDING THE PLAN, THEY SHOULD CONTACT THEIR IMMEDIATE SUPERVISOR OR THE SAFETY DEPARTMENT.

REPORTING EMERGENCIES: The supervisor on duty will be responsible for notifying the appropriate authorities and respond to any emergency that would require police, fire, or emergency medical aid.

RESCUE AND MEDICAL DUTY ASSIGNMENTS: All supervisors are trained in First Aid, CPR, and Bloodborne Pathogens. Notify the supervisor on duty of any injury immediately.

CRITICAL TASKS: The supervisor on duty will be responsible for regulating, notifying the proper utilities (in the event it is deemed necessary) to shut off electricity, gas, water, or any other essential items depending on the emergency.

IN THE EVENT OF AN EMERGENCY

PLEASE CONTACT:

Dean Jackson; SERVICE CENTER MANAGER, 319-310-2150

Brian Sandridge; SAFETY MANAGER, 913-281-0538

XXXXXXXXXXXXXX; FREIGHT OPERATIONS MANAGER, XXX-XXX-XXXX

XXXXXXXXXXXXXX; FREIGHT OPERATIONS MANAGER, XXX-XXX-XXXX

XXXXXXXXXXXXXX; OFFICE MANAGER, XXX-XXX-XXXX

Workplace Injuries Hotline

1-844-237-4312

Call the hotline if you are injured at work

Effective September 1, if you are injured at work, call the workplace injuries hotline for healthcare recommendations. Nurses are standing by to direct you to the right care at the right time.

The workplace injuries hotline is dedicated for XPO Logistics employees and is managed by Sedgwick Claims Management Services.

In the event of a medical emergency

1. Call 911 or go to the ER.
2. Do not call the hotline.
3. Notify your Safety Manager.
4. Call Linehaul Safety at 1-800-622-1151.

If you already received medical care

1. Do not call the hotline.
2. Call Linehaul Safety at 1-800-622-1151.

What to expect when you call

Take the call in a private area to discuss your health concerns with the nurse. The call generally takes less than 15 minutes. During the call, you will need to confirm the injury is work-related and will be asked to provide your:

- Employee ID
- Last 4 digits of SSN
- Date of birth

The disposition of care provided by the nurse is based on your symptoms. If the nurse believes you should seek medical treatment, they will recommend the most appropriate provider and will let the provider know you are on your way.

In the rare instance all nurses are busy assisting other callers, you can remain on the line or leave a message for call-back from the nurse. Three attempts will be made to return the message within 30 minutes.

After the call

A copy of the nurse report will be emailed to you immediately after the call.

24-48 hours after the call, you will be contacted to complete a satisfaction survey and will have the opportunity to speak with a nurse.

Questions

Contact Tina Moore, Tina.Moore@xpo.com, 734-757-1612

HAZARDOUS WASTE MANIFEST		1. Generator ID Number IAR000515635	2. Page 1 of 1	3. Emergency Response Phone (800) 822-8218	4. Manifest Tracking Number 007889109 FLE		
5. Generator Name and Mailing Address Con-Way Freight		Generator's Site Address (if different than mailing address) SAME					
Generator's Phone: (319) 363-6513							
6. Transporter 1 Company Name OSI Environmental, Inc.				U.S. EPA ID Number MNT280011586			
7. Transporter 2 Company Name PIONEER TANK LINES				U.S. EPA ID Number MND044174113			
8. Designated Facility Name and Site Address EXCEL TSD of TN, LLC				U.S. EPA ID Number TND980847024			
Facility's Phone: (901) 774-8146							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	RQ, UN1824, Waste Sodium Hydroxide Solution, 8, PGII <div style="text-align: right;">ERG# 154</div>	1	CF	350	G	D002
14. Special Handling Instructions and Additional Information 9b1 - MPF# 5791-010 <div style="text-align: right;">OSI JOB# 307583</div>							
CERTIFICATE OF DESTRUCTION REQUESTED							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name Liz Frazier Signature: <i>[Signature]</i> Month Day Year: 5 4 15							
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: DENNIS J DAHLMAN Signature: <i>[Signature]</i> Month Day Year: 5 4 15 Transporter 2 Printed/Typed Name: Bob Rowley Signature: <i>[Signature]</i> Month Day Year: 5 20 15						
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number: _____						
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator) Month Day Year: _____						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. T50-H061 2. _____ 3. _____ 4. _____							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a. Printed/Typed Name: Nikki Hammond Signature: <i>[Signature]</i> Month Day Year: 5 21 15							

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IA R000515635		2. Page 1 of 1		3. Emergency Response Phone (800) 822-8218		4. Manifest Tracking Number 008908564 FLE			
		5. Generator's Name and Mailing Address 651 50th Ave. Drive SW, Cedar Rapids, IA 52404 Generator's Phone: (319) 363-6513						Generator's Site Address (if different than mailing address) SAME			
6. Transporter 1 Company Name OSI Environmental, Inc.		U.S. EPA ID Number MN 1280011586									
7. Transporter 2 Company Name		U.S. EPA ID Number									
8. Designated Facility Name and Site Address EXCEL TOWN, LLC 552 Rivergate Road, Memphis, TN 38109		U.S. EPA ID Number TN D980847024									
Facility's Phone: (901) 774-8146											
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) UN1805, Waste Phosphoric Acid Solution, 8, PGIII				10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	X	ERG# 154				001 DM		030	G	D002	
	2.										
	3.										
	4.										
14. Special Handling Instructions and Additional Information 9b1 - MPF# 5791-011 OSI JOB# 308500 64457 CERTIFICATE OF DESTRUCTION REQUESTED											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offor's Printed/Typed Name Liz Frazier Signature <i>[Signature]</i> Month Day Year 12 01 16											
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:										
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name ROBERT CRUZ Signature <i>[Signature]</i> Month Day Year 12 01 16 Transporter 2 Printed/Typed Name Signature Month Day Year										
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: U.S. EPA ID Number										
	18b. Alternate Facility (or Generator) U.S. EPA ID Number										
	Facility's Phone:										
	18c. Signature of Alternate Facility (or Generator) Month Day Year										
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 801-H121 2. 3. 4.										
20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest export as noted in Item 18a Printed/Typed Name Nikki Hammond Signature <i>[Signature]</i> Month Day Year 12 04 16											

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IAR000515635	2. Page 1 of 1	3. Emergency Response Phone (800) 822-8218	4. Manifest Tracking Number 008908756 FLE		
5. Generator's Name and Mailing Address APC Logistics Freight, Inc.				Generator's Site Address (if different than mailing address) GAME			
6. Generator's Phone: (319) 363-6513				U.S. EPA ID Number MNT280011586			
7. Transporter 1 Company Name OSI Environmental, Inc.				U.S. EPA ID Number			
8. Designated Facility Name and Site Address EXCEL TSD of TN, LLC				U.S. EPA ID Number			
562 Rivergate Road, Memphis, TN 38109				TND980847024			
Facility's Phone: (901) 774-8146							

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN1950, Waste Aerosols, 2.1 <div style="text-align: right;">FRG# 126 001 DM 400</div>				P	0001		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
9b1 - MPF# 423042
OSI JOB# 308784
65204 CERTIFICATE OF DESTRUCTION REQUESTED

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
 I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offor's Printed/Typed Name Liz Frasier	Signature <i>[Signature]</i>	Month Day Year 05 20 16
--	---------------------------------	-----------------------------------

16. International Shipments
☐ Import to U.S.
☐ Export from U.S.

Transporter signature (for exports only):
 Date leaving U.S.:

Port of entry/exit:
 Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name
ROBERT CRUDE

Transporter 2 Printed/Typed Name

Signature
[Signature]

Signature
[Signature]

Month Day Year
05 20 16

Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space
☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

18b. Alternate Facility (or Generator)

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)

Manifest Reference Number:

U.S. EPA ID Number

Month Day Year
05 26 16

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. TSD-HALL	2.	3.	4.
--------------------	----	----	----

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name Nathan R Jenkins	Signature <i>[Signature]</i>	Month Day Year 05 26 16
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GENERATOR

INT'L

TRANSPORTER

DESIGNATED FACILITY

Drat/ 735-377576

2743765

Form Approved. OMB No. 2050-0039

print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number

1AR000515635

2. Page 1 of

1

3. Emergency Response Phone

(877) 577-2669

4. Manifest Tracking Number

016314721 JJK

5. Generator's Name and Mailing Address

XFO Logistics Freight, Inc.
651 50th Avenue Dr SW

Generator's Site Address (if different than mailing address)

XFO Logistics Freight, Inc.
651 50th Avenue Dr SW
Cedar Rapids IA 52404

6. Transporter 1 Company Name

MDTRUL LLC

U.S. EPA ID Number

MTD021087275

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address

PETRO CHEM PROCESSING GROUP OF
421 Lyncaste St.

Facility's Phone: PETROIT, MI 48214 (313) 824-5840

U.S. EPA ID Number

MTD980615298

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	1. UN3264 WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (SULFURIC ACID, PHOSPHORIC ACID) 8 PGII -R(0002=100)	2	DF	230	P	0002	0007	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information

(1) NATCHCORACD-05 - ERG(154) 014729/735377576 COR

6451P

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offor's Printed/Typed Name

Signature

Month Day Year
4 25 17

16. International Shipments

☐ Import to U.S.

☐ Export from U.S.

Port of entry/exit:
Date leaving U.S.:

Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials

Transporter's Printed/Typed Name

Signature

Month Day Year
4 25 17

Transporter 2 Printed/Typed Name

Signature

Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space

☐ Quantity

☐ Type

☐ Residue

☐ Partial Rejection

☐ Full Rejection

Manifest Reference Number:

U.S. EPA ID Number

18b. Alternate Facility (or Generator)

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)

Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. H141	2.	3.	4.
------------	----	----	----

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name

Signature

Month Day Year
5 5 17

GENERATOR

INT'L

TRANSPORTER

DESIGNATED FACILITY

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 198000013627		2. Page 1 of 2		3. Emergency Response Phone (877) 877-2669		4. Manifest Tracking Number 017352419 JJK			
		5. Generator's Name and Mailing Address XPS Logistics Freight, Inc. 651 50th Avenue Dr SE Generator's Phone: Leder Road ID 52404						Generator's Site Address (if different than mailing address) XPS Logistics Freight, Inc. 651 50th Avenue Dr SE Leder Road ID 52404			
6. Transporter 1 Company Name STERILE SPECIALTY WASTE SOLUTIONS INC								U.S. EPA ID Number 198000013627			
7. Transporter 2 Company Name								U.S. EPA ID Number			
8. Designated Facility Name and Site Address PEIRO CHEM PROCESSION GROUP OF 471 Eureka St. Facility's Phone: METRO. MI 4014 (413) 824-2846								U.S. EPA ID Number 198000013627			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		1. H2SO4-H2SO4 HAZARDOUS WASTE SOLID (PICKERS), OILS, FILLERS				01	DR	206	P		
		2. UNLACED WASTE SODIUM HYDROXIDE SOLUTION & PASTE (H2SO4-1000)				01	DR	65	P		
		3. UNLACED WASTE SODIUM HYDROXIDE SOLUTION & PASTE (H2SO4-1000)				01	DR	68	P		
		4. UNLACED BATTERIES, MET. FILLED WITH ACID, (LEAD ACID BATTERIES, UNIVERSAL BATTERIES & PASTE)				01	DR	73	P		
14. Special Handling Instructions and Additional Information (1) UNLACED-06 - H2SO4 NOT REGULATED (2) UNLACED-05 - H2SO4 022002 SODIUM HYDROX (3) UNLACED-05 - H2SO4 022004 SODIUM HYDROX (4) UNLACED-07 - H2SO4 022669 LEAD ACID BATT 530192											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offeror's Printed/Typed Name: LIZ Frazier Signature: [Signature] Month: 7 Day: 19 Year: 17											
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:										
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: Glen Thibodeau Signature: [Signature] Month: 7 Day: 19 Year: 17										
	Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:										
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number: Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month: Day: Year:										
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.										
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name: Signature: Month: Day: Year:										

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number	22. Page	23. Manifest Tracking Number		
24. Generator's Name						
25. Transporter Company Name				U.S. EPA ID Number		
26. Transporter Company Name				U.S. EPA ID Number		
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
		No.	Type			
1	1 UNIFORM WASTE SOLUTION HYDROXIDE SOLUTION B F001					
2	2 UNIFORM WASTE SOLUTION HYDROXIDE SOLUTION B F001					
3	3 UNIFORM WASTE SOLUTION HYDROXIDE SOLUTION B F001	01	DR	65		
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
32. Special Handling Instructions and Additional Information						
33. Transporter Acknowledgment of Receipt of Materials						
Printed/Typed Name				Signature		Month Day Year
34. Transporter Acknowledgment of Receipt of Materials						
Printed/Typed Name				Signature		Month Day Year
35. Discrepancy						
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IAR000515635	2. Page 1 of 1	3. Emergency Response Phone (877) 577-2669	4. Manifest Tracking Number 010956656 FL	
		5. Generator's Name and Mailing Address XPO Logistics Freight, Inc. 651 50th Avenue Dr SW Cedar Rapids IA 52404 Generator's Phone: Cedar Rapids IA 52404				
6. Transporter 1 Company Name STERICYCLE SPECIALTY WASTE SOLUTIONS INC					U.S. EPA ID Number MMS000110924	
7. Transporter 2 Company Name					U.S. EPA ID Number	
8. Designated Facility Name and Site Address PETRO CHEM PROCESSING GROUP OF 421 Lycaste St. DETROIT, MI 48214 (313) 824-5848 Facility's Phone: DETROIT, MI 48214 (313) 824-5848					U.S. EPA ID Number MID980615298	
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.
			No.	Type		
		1. NON-RCRA HAZARDOUS WASTE LIQUIDS (VINEGAR, COLTS, SUGARS)		DM		P
		2. NON-RCRA HAZARDOUS WASTE LIQUIDS (WATER-BASED PRODUCTS)	1	DM	449	P
		3.				
		4.				
14. Special Handling Instructions and Additional Information (1) CWFNLS2-02 - 839686861-523454 F00 - STAB01 (2) CWFNRDL1-02 - 522379712-023454 W0N - STAB01 LFO pro IO#						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Typed Name Liz Frazier		Signature <i>Liz Frazier</i>			Month Day Yr 18 3 11	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name Larry Eakins		Signature <i>Larry Eakins</i>		Month Day Yr 18 3 11	
	Transporter 2 Printed/Typed Name		Signature		Month Day Yr	
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	18b. Alternate Facility (or Generator)					U.S. EPA ID Number
	Facility's Phone: _____					
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Yr					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1.		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name		Signature			Month Day Yr	

1 **X** **P.O.L.**

OBTAIN NAME OF ALL PERSONS IN
ATTENDANCE DURING INSPECTION

PRO NO.
AWB NO.

735-377576

INSPECTION REPORT

06034-00 (8/97) LITHO U.S.A.

LIZ Krauer

LOCATION ISSUING REPORT

PRO DATE

DATE FRT. DEL

DATE INSPC REQ

DATE INSPECTOR ASSGND

DATE OF INSPC.

IPS DATE

GCL DATE

CONTROL NUMBER

WAS FREIGHT MOVED AFTER DELIVERY?

YES NO

IF YES, INSPECTED AT

DISTANCE MOVED

BY WHOM/HOW MOVED?

CONSIGNEE

ADDRESS

CITY & STATE

PHONE NO.

SHIPPER

CITY & STATE

DESCRIBE Articles Lost or Damaged

NEW

USED

LIST ALL (Serial No., Model No., Marks)

WEIGHT of
article damaged

10 1 Ctn UN 3204, Corrosive liquid, acidic, inorganic, 20
11 8, PG II Corrosive battery carton / sulfuric acid
12
13
14 L010# 100-55898 / Ref # MKPW 758
15

SHOW Nature and Extent of Loss or Damage

17 punctured in trailer! while unloading
18 not salvagable / entered into Titan
19
20
21
22
23
24

When received, merchandise was In Container Loose Palletized Skidded Wrapped Other

At time of inspection, was there sufficient damage to container to warrant exception? (Explain)

Does consignee claim exception at time of delivery?

Was shipment re-coopered? Yes No If yes, attach sample.

If in container, does damage or loss to contents correspond to damage to the container?

Released or declared value? Unknown Yes \$ per

Is shipper the manufacturer? Yes No If no, manufacturer's name and address

Returned merchandise? Yes No If yes, reason for return

Orig. Carrier

Pro

Dt.

CONTAINER AVAILABLE AT POINT OF INSPECTION? Yes No If no explain

CONTAINER

TYPE FB Box SW DW TW Crate Slat Fully Enclosed New Re-Used Glued Nailed Stapled Strapped Taped Wired Other

Container Maker's Certificate

MARKINGS None Directional Fragile Glass HWC Other

Was internal packaging available at point of inspection? (Explain)

DESCRIBE HOW GOODS WERE PACKED (Describe blocking, bracing, and dunnage use where applicable)

38 Entered into Titan for pu! (by OSI)
39
40
41
42 Awaiting Pu from OSI
43
44
45
46

MUST BE COMPLETED

VALUE
OF COMMODITY
DAMAGED/LOST

\$ UNIC

☐ ACTUAL
INVOICE
☐ ESTIMATED

ATTACH PHOTO IF VALUE EXCEEDS \$500.00

Common Law has established that it is the duty of the consignee to accept injured goods and to make every effort to mitigate the damages by repairing, refurbishing, or otherwise disposing of the injured goods to the best advantage, the carrier being held liable for the difference between the value of the injured goods and their value in the condition in which they were originally delivered to the carrier for transportation.

WILL CONSIGNEE RETAIN
FOR ALLOWANCE?

YES NO ☐ REQUESTED ☐ AGREED

DOES DAMAGE APPEAR
REPAIRABLE?
WILL CONSIGNEE
REPAIR AND USE?

YES NO \$ EST. REPAIRS

WILL CONSIGNEE
SALVAGE MATERIAL?

YES NO \$ EST. SALVAGE VAL.

THIS INSPECTION REPORT IS NOT A CLAIM

SIGNATURE OF CARRIER REP. /CO. NAME

SIGNATURE OF CONSIGNEE REP.

* SEE OTHER SIDE FOR RULES COVERING FILING OF CLAIMS,
DOCUMENTS REQUIRED, AND SALVAGE RETENTION.

DISPOSITION BY CARRIER

SIGNATURE

DATE

SIC

DUMPED SENT TO OS & D CTR LEFT W/CONSIGNEE ON HAND

RETURNED TO SHIPPER DATE

PRO

DIST: WHITE TO GENERAL CLAIMS; YELLOW TO CUSTOMER; PINK TO INSPECTOR

Attachment 16 Page 1 of 9

BOL/SIPPING ORDER

RECEIVED: subject to the classifications and lawfully filed tariffs in effect on the date of issue of this Original Bill of Lading, the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

DATE 11/07/16 LoadID: 60355898 Ref#: MKPW758

F HYDRITE - WATERLOO
R WATERLOO IA 50703
O
M
S DE-CHEM, LLC
H ATTN: TOM NEAL
I 510 WEST ROAD
P SALISBURY, MD 21801
T
O

CUSTOMER ORDER NO. 2016-561 SHIPPED VIA CONWAY/XPO LOGISTICS

QUANTITY ORDERED	QUANTITY SHIPPED	HM	DESCRIPTION	Weight (SUBJECT TO CORRECTION)
***** *****			CONTACT: Larry L'Hotta PHONE: 719-265-9141	
		X	UN3264 CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (CONTAINS SULFURIC ACID) 8 PG II MC247304 LPH 100 53# 5GAL SQ POLY PAIL NMFC # 43940, SUB 2, CLASS 85	1856 LBS
32.0 EA	32.0 EA		HAZMAT SPILL! OSTO Total Net Wght: 1696 LB/ 769.2 KG This product is lot controlled. Lot#: 1102161WL Qty: 32	R# 20
***** ***** ***** *****			COA: LLHOTTA@GMAIL.COM {WAREHOUSE} NEED TO TRIPLE WRAP PALLET TO PREVENT MOVEMENT DURING SHIPMENT.	
			TOTAL GROSS WEIGHT	1856 LBS
<div> <div>Driver's signature acknowledges receipt of freight only. Received shipment is subject to terms of a written contract, if any, otherwise subject to the terms, conditions and limitations of liability set forth in XPO Logistics Freight, Inc. rules tariff. (see www.xpo.com)</div> <div>735-377576 XPO Logistics</div> </div>				
EMERGENCY CONTACT:			1-800-424-9300 (CHEMTREC) CCN#10943	

Received \$ _____ Agent or Cashier _____ Charges Advanced _____ Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: _____ If charges are to be prepaid, wnto or stamp here "To Be Prepaid"

* If the shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is "carrier's or shipper's weight." NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$2.30 per pound.

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper conditions for transportation, according to the applicable regulations of the Department of Transportation.

Shipper Hydrite Chemical Co. Carrier Conway Acceptance Date 11/07/16

Permanent post office address of shipper:

HYDRITE CHEMICAL CO.
2815 WCF & N DRIVE

WATERLOO IA 50703

AGENT MUST SIGN THE ORIGINAL BILL OF LADING AND RETAIN THE SHIPPING ORDER. HYDRITE CHEMICAL CO.'S TERMS AND CONDITIONS OF SALE, WHICH CAN BE FOUND AT WWW.HYDRITE.COM/LEGAL.PHP, ARE AN INTEGRAL PART OF THIS BILL OF LADING AND ARE FULLY INCORPORATED BY REFERENCE. HYDRITE CHEMICAL CO.'S SHIPMENT IS CONDITIONED ON THE CUSTOMER'S ASSENT TO THESE TERMS AND CONDITIONS.

PAGE 1 of 2

Attachment 16 Page 2 of 9

BOL/SIPPING ORDER

RECEIVED: subject to the classifications and lawfully filed tariffs in effect on the date of issue of this Original Bill of Lading, the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route; otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

DATE
11/07/16

LoadID: 60355898
Ref#: MKPW758

F HYDRITE - WATERLOO
R WATERLOO IA 50703
O
M

S DE-CHEM, LLC
H
I ATTN: TOM NEAL
P 510 WEST ROAD
T SALISBURY, MD 21801
O

CUSTOMER ORDER NO.
2016-561

SHIPPED VIA
CONWAY/XPO LOGISTICS

QUANTITY ORDERED	QUANTITY SHIPPED	HM	DESCRIPTION	Weight (SUBJECT TO CORRECTION)
			<p>PLACARDS RECEIVED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> SUPPLIED BY CARRIER</p> <p>PLACARDS <u>Corr 8</u> INITIALS <u>SK</u></p> <p>PLACARDS _____ INITIALS _____</p> <p>PLACARDS _____ INITIALS _____</p> <p>EMERGENCY RESPONSE GUIDE BOOK OR EQUIVALENT VERIFIED TO BE IN VEHICLE.</p> <p>DRIVER SIGNATURE: _____</p>	
			EMERGENCY CONTACT: 1-800-424-9300 (CHEMTREC) CCN#10943	

Received \$ _____ Agent or Cashier _____ Charges Advanced _____ Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignor) _____ If charges are to be prepaid, write or stamp here "To Be Prepaid" PREPAID ADD

* If the shipment moves between two ports by a carrier by water, the law requires that the Bill of Lading shall state whether it is "carrier's or shipper's weight." NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$2.30 per pound.

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper conditions for transportation, according to the applicable regulations of the Department of Transportation.

Shipper Hydrite Chemical Co. Carrier Conway Acceptance Date 11/07/16

Permanent post office address of shipper:

HYDRITE CHEMICAL CO.
2815 WCF & N DRIVE

WATERLOO IA 50703

AGENT MUST SIGN THE ORIGINAL BILL OF LADING AND RETAIN THE SHIPPING ORDER
HYDRITE CHEMICAL CO.'S TERMS AND CONDITIONS OF SALE, WHICH CAN BE FOUND AT WWW.HYDRITE.COM/LEGAL.PHP, ARE AN INTEGRAL PART OF THIS BILL OF LADING AND ARE FULLY INCORPORATED BY REFERENCE. HYDRITE CHEMICAL CO.'S SHIPMENT IS CONDITIONED ON THE CUSTOMER'S ASSENT TO THESE TERMS AND CONDITIONS.

EOB 2 of 2

Salvage Request

Request ID :	324709	Request Status :	Not Approved for Salvage - (Open Request To Review Next Steps of F.E.G Instructions)
Assigned To:	LJMCQUAY		
Request Date :	11/21/2016	Requestor SIC :	XCR
Requestor :	FRAZIER, LIZ	Requestor Email :	LIZ.FRAZIER@EMAIL.XPO.COM
Original Pro :	735377576	Salvage Pro :	
Request Type:	Haz-Mat/Regulated Disposal		

Add
Response

Submit

Email
Message:

-- Original Message Sent on Mon Nov 21 14:21:58 CST 2016
 -- From: LONNIE.MCQUAY@EMAIL.XPO.COM
 -- To: LIZ.FRAZIER@EMAIL.XPO.COM
 -- CC: THOMAS.PETHO@EMAIL.XPO.COM

Subject Goods are NOT to be sent to CMK

1. Because subject goods typically require special handling; and in many cases may be regulated as to disposition, disposal and handling method, **final disposition of and/or disposal method for, should be handled at the service center level in conjunction with guidelines managed through our Facility Environmental Group (FEG)**
2. Disposition method should be handled adhering to FEG instructions, including published operating protocols, to ensure appropriate disposition, recycling, and/or disposal of subject goods, and inclusive of PHOTOS being placed in Image
3. Please direct all questions and inquiries to the Environmental Group at XPOenvironmental@xpo.com for compliance procedures, vendors, and contacts related to the final disposition of all dangerous, hazardous and/or regulated substances
4. Image a copy of this SALVAGE REQUEST ID correspondence as DRAT
5. Copied: thomas.petho@xpo.com with the Facility Environmental Group (FEG) @XGO

template last updated: 08/02/2016

OS&D Action Items (completion required PRIOR TO any salvage inquiry)

Did you physically inspect this merchandise?	Y
If an OVERAGE, did you perform searches via OPT, GOWB, and Salvage Tool for possible matching?	Y
	Y

All accompanying source documents imaged, i.e. on-hand notices sent, communiques, e-Mails, etc.?

Digital photos taken and imaged in proper bucket selection in FotoFACILITY, i.e. OVER/SHORT, or DAMAGED (do not image under LOA, DRAT, etc.)

Y

Did you SEARCH the APB's (all-points-bulletin) list for possible matching?

Y

Did you check to see if an 'ACTIVE' claim may be in process for this incident?

Y

HAZARDOUS and/or DANGEROUS GOODS DO NOT GO TO SALVAGE (CMK)

Does this merchandise contain any DANGEROUS, HAZARDOUS, Rx or REGULATED substance that does, or could, potentially require a regulated method of handling, movement, or disposal?

Y

Qualify the merchandise

IS THIS MERCHANDISE

Damage - Claim Status Unknown

Quantify the merchandise

How Packaged?

Carton

Pieces?

1

Weight?

20

Dimensions?

12 Long X 12 Wide X 12 High and/or
1 Circumference

Declare the overall condition of merchandise?

Trash

(trash = worst / 5 = best)

Identify the merchandise

What is this merchandise?

battery

What is the **BRAND** of merchandise?

HYDRITE CHEMICAL

Provide UPC codes, model number, serial numbers, and/or unique markings visible on the packaging and/or actual merchandise.

UN3264, corrosive liquid, acidic, inorganic, type 8, PGIII, sulfuric acid, BOL/Load ID# 60355898, ref#MKPW758

Comments.

punctured by forklift. contained in 2 blue 55 gal barrels for OSI, awaiting Pick up.

Merchandise Value

AS A CONSUMER, estimate the value of the merchandise, not the packaging in its PRESENT CONDITION. \$100 or less

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number <i>10000000000000</i>		2. Page 1 of <i>1</i>	3. Emergency Response Phone <i>(877) 477-2669</i>		4. Manifest Tracking Number 016314721 JJK		
		5. Generator's Name and Mailing Address <i>ZEP Logistics Freight, Inc. 451 34th Avenue Dr SW Tucker, GA 30084</i>		Generator's Site Address (if different than mailing address) <i>ZEP Logistics Freight, Inc. 451 34th Avenue Dr SW Tucker, GA 30084</i>					
6. Transporter 1 Company Name <i>WILLIAMS, LLC</i>		U.S. EPA ID Number <i>RI000000000</i>							
7. Transporter 2 Company Name		U.S. EPA ID Number							
8. Designated Facility Name and Site Address <i>FEIRP CHEM PROCESSING GROUP OF 423 Locust St. Tucker, GA 30084</i>		U.S. EPA ID Number <i>RI000000000</i>							
9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) <i>1. ACIDIC AQUEOUS CORROSIVE LIQUID, AQUEOUS, INORGANIC, A.C.S. (300 FORT. AID, PHOSPHORIC ACID) 8 1023 000000-1000</i>			10. Containers No. <i>2</i> Type <i>DF</i>		11. Total Quantity <i>230</i>	12. Unit Wt./Vol.	13. Waste Codes <i>1002 1007</i>
14. Special Handling Instructions and Additional Information <i>1. HAZARDOUS - 85 - F001(30) 014/25-730/75% JJK</i>									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offoror's Printed/Typed Name <i>A. L. L. L. L.</i>					Signature <i>A. L. L. L. L.</i>		Month <i>4</i>	Day <i>25</i>	Year <i>17</i>
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name <i>Vince Johnson</i>					Signature <i>Vince Johnson</i>		Month <i>4</i>	Day <i>25</i>	Year <i>17</i>
Transporter 2 Printed/Typed Name					Signature		Month	Day	Year
18. Discrepancy									
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
Manifest Reference Number: _____									
18b. Alternate Facility (or Generator) U.S. EPA ID Number									
Facility's Phone: _____									
18c. Signature of Alternate Facility (or Generator)							Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. <i>0141</i>		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name					Signature		Month	Day	Year

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

Attachment 14 Page 7 of 9



Stericycle

ENVIRONMENTAL SOLUTIONS

Drat / 735-377576

CERTIFICATE OF RECYCLING/DISPOSAL

This certifies that the material associated with the attached manifest has been received and processed for the proper recycling/disposal method(s) as defined by local, state and federal regulations.

Facility Name:	Petro-Chem Processing Group, LLC
Address:	421 Lycaste Detroit, MI 48214
EPA ID Number:	MID 980 615 298
Phone Number:	(313) 824-5840

Signature: Melanie Fiskup

Title: Stericycle Representative



Stericycle®

Environmental Solutions

LAND DISPOSAL RESTRICTION NOTIFICATION CERTIFICATION FORM

Generator Name: XPO Logistics Freight, Inc.

IAR000515835

Manifest Number: 016314721JJK

Generator EPA ID Number:

The purpose of this form is to provide appropriate notification/certification, in accordance with the Land Disposal Restriction regulations set forth in 40 CFR Part 268, to the treatment, storage or disposal facility which receives the wastes referenced below. In accordance with the waste analysis and recordkeeping requirements specified in 40 CFR 268.7, I have indicated below the relevant information required to properly manage my waste(s) in compliance with the Land Disposal Restriction treatment standards found in 40 CFR 268 and any applicable prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d).

Line 1 Profile: NATCWFCORACD- Treatability Group: Non-Waste/Water
Waste Codes

UHC's: Y

Class Group: A

D002 - Corrosive managed in a NONCWA system

D007 - CHROMIUM

See back for descriptions of classification groups and classification group certification statement.

I hereby certify that I believe that the information I submitted herein is true, accurate and complete.

Signature: [Signature]

Title: OSTD clerk

Date: 4/25/17

Container Detail

Active Containers		Completed Containers							
Show 25 items				Search: <input type="text"/>					
Container ID #	PRO #	Alert #	Status	Location	Waste Type	Date Deemed Waste	Days on Hand	Scheduled Pick Up Date	
XPO Logistics Freight, Inc. - XCR - 026265	839173952	59792	Complete	Waste Area	Non-Hazardous Waste	9/5/2017	0		
XPO Logistics Freight, Inc. - XCR - 019277	609589525	54425	Complete	Waste Area	Non-Hazardous Waste	5/9/2017	0	6/6/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 022798	844709972	56312	Complete	Waste Area	Hazardous Waste	6/21/2017	0	7/19/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 022669	427361255	6168	Complete	Waste Area	Universal Waste	6/20/2017	0	7/19/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 022534	298801904	56025	Complete	Waste Area	Non-Hazardous Waste	6/15/2017	0	7/19/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 022532	298801904	56025	Complete	Waste Area	Non-Hazardous Waste	6/15/2017	0	7/19/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 019278	609589525	54425	Complete	Waste Area	Non-Hazardous Waste	5/9/2017	0	7/19/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 023464	839686061	56948	Complete	Waste Area	Non-Hazardous Waste	7/6/2017	0	7/26/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 022790	298801904	56303	Complete	Waste Area	Hazardous Waste	6/21/2017	0	7/3/2017 12:00:00 AM	
XPO Logistics Freight, Inc. - XCR - 022784	298801904	56303	Complete	Waste Area	Hazardous Waste	6/21/2017	0	7/3/2017 12:00:00 AM	
	735377576	48158	Complete	Waste Area		11/11/2016	0		

Attachment 17 page 1 of 2

Container ID #	PRO #	Alert #	Status	Location	Waste Type	Date Deemed Waste	Days on Hand	Scheduled Pick Up Date
XPO Logistics Freight, Inc. - XCR - 014729					Hazardous Waste			4/25/2017 12:00:00 AM
XPO Logistics Freight, Inc. - XCR - 004352	670673640	28685	Complete	Waste Area	Hazardous Waste	2/24/2016	0	
XPO Logistics Freight, Inc. - XCR - 000420	230730695	22665	Complete	Waste Area	Non- Hazardous Waste	5/22/2015	0	
XPO Logistics Freight, Inc. - XCR - 012158	No Pro		Complete	Other - Location in Notes	Non- Hazardous Waste	8/9/2016	0	
XPO Logistics Freight, Inc. - XCR - 011765	726190183	42501	Complete	OS&D - Dock	Non- Hazardous Waste	7/27/2016	0	
XPO Logistics Freight, Inc. - XCR - 021269	726190183	42501	Complete	OS&D - Dock	Non- Hazardous Waste	7/27/2016	0	
XPO Logistics Freight, Inc. - XCR - 001807	674030840	25395	Complete	OS&D - Dock	Non- Hazardous Waste	7/8/2015	0	
XPO Logistics Freight, Inc. - XCR - 008283	619197036	35360	Complete	OS&D - Dock	Hazardous Waste	3/9/2016	0	
XPO Logistics Freight, Inc. - XCR - 002048	230-592-165	25692	Complete	OS&D - Dock	Hazardous Waste	8/18/2015	0	

RECORD CONTROL CHECK SHEET

Media

Air	RCRA	Water	Other
	X		

Date of Inspection 09/19-20/2017

Activity Number _____

Facility ID Number IAR 000515635

Facility Name and Address XPO Logistics Freight, Inc. - XCR
651 50th Avenue Drive SW
Cedar Rapids, IA 52404

The following documents pertaining to this activity are contained in the package:

<u>Document</u>		<u>Yes</u>	<u>No</u>	<u>NA</u>
Final Report with attachments	<u>83</u> Pages	(✓)	()	()
Field sheets	<u>8</u> Pages	()	()	(✓)
Chain of Custody	<u>8</u> Pages	()	()	(✓)
Analytical data sheets	<u>8</u> Pages	()	()	(✓)
Pre-inspection documents	<u>8</u> Pages	()	()	(✓)
Photographic negatives (if applicable)	<u>8</u> Pages	()	()	(✓)
Photographs (not included in this report)	<u>2</u> Pages	(✓)	()	()
CD-ROM containing <u>20</u> photos/videos	<u>1</u> CD-ROM	(✓)	()	()
Field notebook w/ <u>8</u> pages used	<u>8</u> Notebook	()	()	()
Other documents (list below)				
<u>Field Notes</u>	<u>10</u> Pages			
<u> </u>	<u>8</u> Pages			
<u> </u>	<u>8</u> Pages			
<u> </u>	<u>8</u> Pages			

(Note: If additional space is needed to list specific documents, utilize reverse side)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

William A. Stum 10/24/2017
 Activity Leader's Signature and Date

Facility Name / City: XPO Logistics Freight, Inc. – XCR
651 50th Avenue Drive SW
Cedar Rapids, IA 52404

Facility ID #: IAR000515635

Date: September 19 – 20, 2017

Photographer: William F. Starks

Type of Camera: Sony Digital Still Camera, DCS – W830, Serial #1310546

Digital Recording Media: Memory Stick

All digital photos were copied by: William Starks on 10/04/2017

All digital photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital photos were downloaded to CD-R by William Starks on 10/04/2017. No changes were made in the original image files prior to print and storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCFxxxx.jpg)	Description
1	William Starks	09/19/2017	1443	011	Photograph not used in report

XPO LOGISTICS FREIGHT, INC. - XCR
CEDAR RAPIDS, IA

Photo Number: 1
Photographer: William F. Starks
Date: 09/19/2017
Time: 1443
Description: Photograph not used
in report

